

# EXHIBIT 4

**From:** [Chi, Justin J.](#)  
**To:** [Bombach, Miguel J. \(SDO\)](#); [Canavera, Kyle Ryan \(SDO\)](#)  
**Cc:** [Callagy, Sean M.](#)  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE  
**Date:** Wednesday, November 07, 2018 10:39:00 AM  
**Attachments:** [image001.jpg](#)

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Yes, that is correct.

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**From:** Bombach, Miguel J. (Perkins Coie) [mailto:MBombach@perkinscoie.com]  
**Sent:** Wednesday, November 07, 2018 10:37 AM  
**To:** Chi, Justin J.; Canavera, Kyle (Perkins Coie)  
**Cc:** Callagy, Sean M.  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Justin, just to clarify, the source code will be made available for HTC's inspection by Tuesday 11/13, correct?

**Miguel Bombach | Perkins Coie LLP**

11988 El Camino Real Suite 350  
San Diego, CA 92130-2594  
D. +1.858.720.5747  
C: +1 646.469.1474  
F. +1.858.720.5847  
E. [MBombach@perkinscoie.com](mailto:MBombach@perkinscoie.com)

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**From:** Chi, Justin J. <Justin.Chi@arnoldporter.com>  
**Sent:** Wednesday, November 07, 2018 10:22 AM  
**To:** Bombach, Miguel J. (SDO) <MBombach@perkinscoie.com>; Canavera, Kyle Ryan (SDO) <KCanavera@perkinscoie.com>  
**Cc:** Callagy, Sean M. <Sean.Callagy@arnoldporter.com>  
**Subject:** FW: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Miguel,

Per the email below, Google will make the source code available for review no later than Tuesday (11/13). Please let us know if this addresses HTC's concerns.

Thanks,  
Justin

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**From:** Callagy, Sean M.  
**Sent:** Wednesday, November 07, 2018 10:19 AM  
**To:** Chi, Justin J.  
**Cc:** Berta, Michael A.; Blackburn, James S.; Lee, Nicholas  
**Subject:** FW: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

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**From:** Callagy, Sean M.  
**Sent:** Wednesday, November 07, 2018 10:18 AM  
**To:** Shea, Daniel

**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Dan,

I expect the review machine to be up and running by this coming Monday and no later than Tuesday, and will update you once I have more precise information.

Separately, pursuant to the PO, Google objects to Mr. McAlexander reviewing, directly or indirectly, Google confidential information or testifying adverse to Google and its products. As Mr. McAlexander may have informed you, he is presently a consultant for Google in other matters, and has contractually obligated himself not to testify adverse to Google and its products.

Finally, Google maintains its objections to other categories of documents sought by AGIS. AGIS has made no showing that these materials are relevant, nor that they cannot be obtained from actual parties to the lawsuit such that Google should bear the burden of providing them. Merely claiming that certain defendants “punted to Google” or “identified Google” does not suffice.

Best,  
Sean

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**From:** Shea, Daniel [<mailto:DShea@brownrudnick.com>]  
**Sent:** Tuesday, November 06, 2018 12:41 PM  
**To:** Callagy, Sean M.  
**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Sean,

Following up on the source code review, please let us know ASAP when the code will be available for inspection.

Please also let us know when Google will begin producing documents responsive to the Subpoenas.

Regards,  
Dan



**Daniel Shea**

Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212.209.4879  
F: 212.938-2979  
[dshea@brownrudnick.com](mailto:dshea@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)

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**From:** Shea, Daniel  
**Sent:** Friday, November 02, 2018 3:46 PM  
**To:** Callagy, Sean M.  
**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Sean,

Attached are signed undertakings and CVs for Omid Kia, Rahul Vijh and Joseph McAlexander. Also attached is a copy of the PO for your reference.

Please let us know today the date and location for the code review.

Thanks,  
Dan



**Daniel Shea**

Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212.209.4879  
F: 212.938-2979  
[dshea@brownrudnick.com](mailto:dshea@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)

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**From:** Callagy, Sean M. [<mailto:Sean.Callagy@arnoldporter.com>]  
**Sent:** Thursday, November 01, 2018 5:11 PM  
**To:** Shea, Daniel  
**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

**External E-mail. Use caution accessing links or attachments.**

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The review will be in the Bay Area – likely A&P’s office in SF or SV.

Please tell us this week who you intend to have review the code, and provide signed Undertakings for any persons who are required to provide them under Sections 6(e) and 11(c) of the PO.

Best,  
Sean

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**From:** Shea, Daniel [<mailto:DShea@brownrudnick.com>]  
**Sent:** Thursday, November 01, 2018 8:27 AM  
**To:** Callagy, Sean M.  
**Cc:** AGIS-Lit

**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Sean,

Thanks for getting back. We look forward to getting a firm date for a review next week.

Where will the code be made available? We'd like to start coordinating logistics on our end.

Regards,  
Dan



**Daniel Shea**

Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036  
T: 212.209.4879  
F: 212.938-2979  
[dshea@brownrudnick.com](mailto:dshea@brownrudnick.com)  
[www.brownrudnick.com](http://www.brownrudnick.com)

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**From:** Callagy, Sean M. [<mailto:Sean.Callagy@arnoldporter.com>]  
**Sent:** Wednesday, October 31, 2018 6:32 PM  
**To:** Shea, Daniel  
**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

Dan,

Thanks for the follow-up. I have been informed that the code should be available for review next week – hope to have a date certain for you by the end of this week.

Best,  
Sean

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**From:** Shea, Daniel [<mailto:DShea@brownrudnick.com>]  
**Sent:** Wednesday, October 31, 2018 11:31 AM  
**To:** Callagy, Sean M.  
**Cc:** AGIS-Lit  
**Subject:** RE: Google Subpoena - AGIS v Huawei, HTC, LG, ZTE

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