

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

CASE NO.

vs.

12-CV-2826(DLC)

APPLE INC., et. al,

Defendants.

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\*\*HIGHLY CONFIDENTIAL\*\*

VIDEOTAPED DEPOSITION OF KEVIN SAUL

FRIDAY, FEBRUARY 22, 2013

9:11 A.M.

REPORTED BY:  
KIMBERLEE SCHROEDER, CSR, RPR, CCRR  
JOB NO. 28893

KEVIN SAUL - HIGHLY CONFIDENTIAL

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1 10:28:51 Can you tell me whether you received any  
2 10:28:53 general training regarding antitrust compliance while  
3 10:28:57 at Apple?  
4 10:28:58 A. I don't recall.  
5 10:29:01 Q. Do you recall ever receiving, again, general  
6 10:29:07 antitrust compliance training?  
7 10:29:12 A. I don't recall.  
8 10:29:13 Q. Do you receive any training of any kind at  
9 10:29:17 Apple?  
10 10:29:18 A. General training -- general training, yes, in  
11 10:29:31 areas that may impact the business.  
12 10:29:37 Q. For example, you may receive training on  
13 10:29:39 appropriate workplace conduct? Is that an area you  
14 10:29:42 may receive training on?  
15 10:29:44 A. That one is a possibility, sure.  
16 10:29:48 Q. But you, sitting here today, you don't know  
17 10:29:51 whether for sure you do?  
18 10:29:52 A. Do what?  
19 10:29:53 Q. Sitting here today, do you know whether for  
20 10:29:56 sure you receive any training on appropriate workplace  
21 10:29:59 conduct?  
22 10:29:59 A. I don't recall.  
23 10:30:00 Q. A fair amount of your work involves -- and I  
24 10:30:06 apologize. You see what I'm doing. I'm using my  
25 10:30:09 hand.

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REPORTER'S CERTIFICATE

I, KIMBERLEE SCHROEDER, CSR 11414, duly authorized to administer oaths pursuant to Section 30(c) of the Federal Rules of Civil Procedure, hereby certify that the witness in the foregoing deposition was by me duly sworn to testify the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of the said witness was reported by me and thereafter transcribed by me and that the witness was given an opportunity to read and correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties to said cause of action, nor in any way interested in the outcome of the cause named in said cause of action.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated this 24th day of February, 2013.

KIMBERLEE SCHROEDER, CSR, RPR, CCRR