

## EXHIBIT C

**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

In re:

Apple iPhone 3G Products Litigation

MDL Docket No.

**SEPARATE STATEMENT OF REASONS WHY ORAL ARGUMENT SHOULD  
BE HEARD IN SUPPORT OF MOTION FOR TRANSFER AND  
CONSOLIDATION OF RELATED APPLE IPHONE 3G PRODUCTS  
LITIGATION PURSUANT TO 28 U.S.C. § 1407**

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Pursuant to Rule 16.1(b) of the Rules of Procedure for the Judicial Panel on Multidistrict Litigation (the "Panel"), defendant Apple Inc. ("Apple") submits this Separate Statement of Reasons Why Oral Argument Should Be Heard in further support of its concurrently filed Motion for Transfer and Consolidation pursuant to 28 U.S.C. section 1407.

There are numerous reasons why oral argument should be heard on Apple's pending motion to transfer. Oral argument is necessary to address any possible opposition raised regarding whether the objectives of the transfer statute are sufficiently served to justify transfer. Moreover, the parties will be able to respond to any inquiries the Panel might have about the specific advantages posed by transfer to the Northern District of California. Finally, oral argument would serve the purposes of efficiency and judicial economy. There are twelve separate actions pending in five different federal district courts. The parties are collectively represented by nineteen (19) law firms. Having counsel present before the Panel to respond to any questions the Panel may have that were not addressed by the parties' briefs would ensure that the Panel has complete information regarding the facts and the parties' positions as to the propriety of transfer or the propriety of the proposed transferee district.

For the foregoing reasons, Apple respectfully requests that the Panel grant oral argument on its motion for an order transferring and consolidating the related Apple iPhone 3G Products Litigation to the Northern District of California.

Dated: March 4, 2009

Respectfully submitted,

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