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8 Plaintiffs' Proposed Lead Counsel
 [Additional counsel appear on signature pages]
 9

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

12 JAMES R. PITTMAN, Individually and on) Case No. C 08-05375 JW
 Behalf of All Others Similarly Situated,)
 13 _____)

14 HAIG ASHIKIAN, etc.,) Case No. C 08-05810 JW
 _____)

15 PETER KELLER, etc.,) Case No. C 09-00121 JW
 _____)

16 WILLIAM GILLIS, etc.,) Case No. C 09-00122 JW
 _____)

17 AARON WALTERS, etc.) Case No. C 09-00187 JW
 _____)

18 JACOB MEDWAY, etc., et al.,) Case No. C 09-00330 JW
 _____)

19 EULARDI TANSECO, etc., et al.,) Case No. C 09-00275 JW
 _____)

20 JESSICA ALENA SMITH, et al.,) Case No. C 09-01028 RS
 _____)

21 Plaintiffs,)

22 v.)

23 APPLE INC.,)

24 Defendants.)
 25 _____)

CLASS ACTION

**CLASS PLAINTIFFS' JOINT NOTICE
 OF MOTION AND MOTION FOR
 APPOINTMENT OF INTERIM CLASS
 COUNSEL STRUCTURE**

Hearing Date: April 13, 2009
Time: 9:00 a.m.
Courtroom: Hon. James Ware

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**NOTICE OF MOTION AND MOTION FOR APPOINTMENT
OF CLASS COUNSEL STRUCTURE**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE on April 13, 2009 at 9:00 a.m., or as soon thereafter as the matter may be heard, before the Honorable James Ware, Judge of the United States District Court for the Northern District of California, San Jose Division, located at 280 S. First Street, San Jose, CA 95113, Plaintiffs in the above-related actions will and hereby do jointly move pursuant to Federal Rule of Civil Procedure 23(g) for appointment of an Interim Class Counsel structure as detailed in the accompanying Memorandum of Points and Authorities.

This motion is based on the Notice of Motion and Motion; attached Memorandum of Points and Authorities; Declaration of Alan M. Mansfield in support hereof; all pleadings and papers filed herein and in each case; such additional evidence and oral argument the Court may consider and any other matters properly before the Court.

ISSUE PRESENTED

Should the Court approve the Interim Class Counsel structure proposed by plaintiffs in these eight related actions as consistent with Federal Rule of Civil Procedure 23(g)'s requirements?

MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to the Court's March 5, 2009 Order Vacating Case Management Conference; Setting Hearing on Motion re: Consolidation and Appointment of Interim Class-Counsel ("Order") and Federal Rule of Civil Procedure 23(g)(1)(A)(3), and as a follow-on to the stipulation previously submitted to the Court, Plaintiffs in the related actions pending before the Court (collectively "Plaintiffs") submit this Memorandum in support of their joint motion to appoint (1) Whatley Drake & Kallas, LLC ("Whatley Drake") as Lead Interim Class Counsel, and (2) an Executive Committee consisting of a representative from each of the pending related cases

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1 (collectively, “Proposed Class Counsel”) to facilitate the efficient and orderly prosecution of the
2 case on behalf of Plaintiffs and the proposed class.¹

3 I. INTRODUCTION

4 As reflected in the Court’s March 5, 2009 Order, in complex proposed nationwide class
5 actions, the Federal Rules of Civil Procedure envision the Court reviewing and approving a
6 qualified leadership structure at the litigation’s early stages to ensure the proceedings advance in
7 an orderly, expeditious, and cost-effective manner. The Advisory Committee’s Notes to Rule
8 23(g) stress “the selection and activity of class counsel are often critically important to the
9 successful handling of the class action.” Fed. R. Civ. Proc. 23(g) (Notes of the Advisory
10 Committee). This joint Motion, brought by and on behalf of the class plaintiffs in the eight
11 related actions before the Court, satisfies Rule 23(g) as it seeks adoption of a Class Counsel
12 structure involving numerous well-qualified law firms experienced in managing complex class
13 actions.

14 The Court should approve this proposed structure for the following reasons. First,
15 Proposed Class Counsel have collectively demonstrated their willingness and ability to commit to
16 this litigation. Counsel in these actions, which were among the first filed, have voluntarily agreed
17 to transfer actions from around the country to the forum most likely able to handle these matters
18 on a nationwide basis. Counsel have undertaken a significant amount of work in identifying and
19 investigating potential claims and the claims in issue. Proposed Class Counsel have

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22 ¹ The Plaintiffs in the following related class action cases currently pending before this Court
23 support the instant Motion: (1) *Jessica Alena Smith*, Case No. C 09-01028 RS, filed on
24 August 19, 2008 in the Northern District of Alabama and transferred to this Court on
25 February 23, 2009; (2) *Eulardi Tanseco*, Case No. C 09-00275 JW, filed on August 29, 2008 in
26 the District of New Jersey and transferred to this Court on January 22, 2009; (3) *William Gillis*,
27 Case No. C 09-00122 JW, filed on August 29, 2008 in California state court and subsequently
28 removed to the Southern District of California and transferred to this Court on January 15, 2009;
(4) *Aaron Walters*, Case No. C 09-00187 JW, filed on September 12, 2008 in the Eastern District
of Arkansas and re-filed in this Court on January 15, 2009; (5) *Peter Keller*, Case No. C 09-
00121 JW, filed November 19, 2008 in the Southern District of California and transferred to this
Court on January 9, 2009; (6) *James R. Pittman*, Case No. C 08-053785 JW, filed on
November 26, 2008; (7) *Haig Ashikian*, Case No. C 08-05810 JW, filed on December 31, 2008;
and (8) *Jacob Medway*, Case No. C09-00330 JW, filed January 26, 2009.

1 communicated with counsel for defendant Apple Inc. to establish the orderly and efficient
2 prosecution of this litigation.²

3 Second, Proposed Class Counsel have shown their leadership skills and have
4 demonstrated their desire and ability to work efficiently, effectively and cooperatively with each
5 other. As a result of their litigation efforts, counsel for all the class action plaintiffs in this
6 litigation have reached a consensus: (1) Whatley Drake should serve as Lead Interim Class
7 Counsel, and (2) the firms of Schoengold Sporn Laitman & Lometti, P.C., Rosner & Mansfield,
8 LLP, Emerson Poynter, LLP, Finkelstein Thompson, LLP, Glancy Binkow & Goldberg, LLP,
9 Hiden Rott & Oertle LLP, The Litigation Law Group, and Heninger Garrison Davis, LLC, should
10 serve on an Executive Committee so each of the eight related actions before the Court is
11 represented. As discussed in detail below, these firms have practiced in complex litigation and
12 have an established track record in consumer litigation. Where, as here, the parties agree among
13 themselves to a leadership structure that best supports the class, absent some extraordinary
14 finding of infirmity, the Court should approve the proposed leadership structure. *U.S. Trust Co.*
15 *of N.Y. v. Alpert*, 163 F.R.D. 409, 423 (S.D.N.Y. 1995).

16 Third, appointment of Proposed Class Counsel will ensure the continued, efficient and
17 orderly prosecution of these related actions and secure the best possible representation for the
18 putative class. As this Motion is supported by all of the named plaintiffs and their counsel,
19 plaintiffs respectfully request the Court grant this joint Motion.

20 **II. ARGUMENT**

21 The main criteria for appointment of lead counsel are: (1) willingness and ability commit
22 to the process; (2) ability to work cooperatively with others; (3) professional experience in this
23 type of litigation; and (4) access to sufficient resources to advance the litigation in a timely
24 manner. *See* Fed. R. Civ. Proc. 23(g)(1)(A). As set forth below, Whatley Drake and the
25 Executive Committee members satisfy all four criteria. Proposed Class Counsel already have

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27 ² Counsel has met and conferred with Apple's counsel concerning this motion. Although
28 Apple agrees a plaintiff counsel structure should be approved early on so they may interact with a
Court-approved unified group structure, Apple takes no position on this Motion. Declaration of
Alan M. Mansfield ("Mansfield Decl.") at ¶ 13.

1 collectively demonstrated their willingness and ability to commit to this litigation and have
2 demonstrated they are able to do so.

3 **A. Proposed Class Counsel Have Demonstrated Their Willingness and Ability to**
4 **Commit to this Litigation**

5 Proposed Class Counsel have already taken significant steps to advance this litigation by
6 agreeing to prosecute these cases in a logical central forum and have demonstrated their
7 willingness and ability to commit to this litigation. The investment of significant time and effort
8 so far makes counsel the most appropriate candidates to fill the role of Class Counsel. *See, e.g.,*
9 *Browning v. Yahoo! Inc.*, No. C04-01463, 2006 WL 3826714, at *4 (N.D. Cal. Dec. 27, 2006)
10 (appointing class counsel, based in part on substantial work done “identifying or investigating
11 potential claims”); *see also* Fed. R. Civ. P. 23(g)(1)(A)(i).

12 These related actions were filed in District Courts around the country, including Alabama,
13 New Jersey and Arkansas. Because Apple’s operations are located in this District and Division,
14 counsel voluntarily agreed these actions would be most efficiently prosecuted if they were all
15 transferred to a single court and subject to consolidated proceedings. Counsel further agreed to
16 being coordinated under a structure of one lead counsel in active consultation with an Executive
17 Committee, with a representative from each of the related cases currently before the Court.
18 Acting within the structure, these firms have and continue to conduct research and informal
19 discovery and investigation regarding such claims. Hence when an order is entered they will be
20 able to promptly prepare and file a Consolidated Amended Complaint. They also are working to
21 craft a coordinated response to the pending Multi-District Litigation Petition filed by Apple to
22 transfer four currently-pending state-wide class actions, as well as any other subsequently filed
23 actions, to this District. Such effort demonstrates not only the ability of Proposed Class Counsel
24 to commit to the successful litigation of these claims, but also Proposed Class Counsel are
25 qualified to adequately serve the interests of the putative class pursuant to Federal Rule of Civil
26 Procedure 23(g).

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1 **B. Proposed Class Counsel Affirm their Commitment to Work Cooperatively**
2 **with Each Other**

3 Whatley Drake is committed to fostering a cooperative, unified working relationship with
4 all plaintiffs’ counsel on the Executive Committee. The cooperative spirit Proposed Class
5 Counsel promises to bring to this litigation is evidenced by the agreement of all counsel to the
6 proposed leadership structure. Whatley Drake has and will coordinate and consult with the
7 Proposed Executive Committee on drafting the consolidated amended complaint, responding to
8 the pending MDL Petition, investigating claims, conducting legal research, propounding
9 discovery, and retaining experts. The leadership capabilities of Proposed Class Counsel have
10 already been borne out in this litigation, as Proposed Class Counsel have successfully organized
11 the nationwide and statewide class actions currently pending in this District from around the
12 country. Therefore, Proposed Class Counsel have already demonstrated their ability to
13 coordinate, compromise and work together, all of which are essential functions in leading and
14 managing complex litigation.

15 **C. Proposed Lead Class Counsel Possess the Professional Experience,**
16 **Knowledge and Resources to Successfully Litigate the Actions**

17 Proposed Class Counsel are able to adequately represent the interests of the proposed class
18 pursuant to Federal Rule of Civil Procedure Rule 23(g). In the class certification context, courts
19 hold a class is fairly and adequately represented where counsel are qualified, experienced and
20 generally able to conduct the litigation on its behalf. *See, e.g., In re Agent Orange Prod. Liab.*
21 *Litig.*, 996 F.2d 1425, 1435 (2d Cir. 1993); *In re NASDAQ Market-Makers Antitrust Litig.*, 169
22 F.R.D. 493, 512 (S.D.N.Y. 1996) (class counsel satisfy adequacy requirement where they are able
23 to prosecute the action vigorously). Further, where proposed class counsel demonstrate they are
24 “ready, willing and able to devote the resources necessary to litigate the case vigorously,” the
25 adequacy requirement is satisfied. *NASDAQ*, 169 F.R.D. at 515.

26 The appointment of the Interim Class Counsel structure set forth in the accompanying
27 proposed order attempts to guarantee the best interests of plaintiffs and the putative class will be
28 adequately represented. As set forth in the accompanying Mansfield Declaration and the attached

1 exhibits, many of these firms are reputed nationwide class action law firms who collectively have
2 the necessary resources, experience and geographic coverage to vigorously prosecute this
3 litigation against well-respected counsel. Proposed Class Counsel have represented plaintiff
4 classes on a wholly contingent basis, advanced costs and expenses, and litigated numerous class
5 cases at the trial and appellate levels, securing many landmark rulings along the way. Proposed
6 Class Counsel intend to work together as a team to ensure all necessary resources are made
7 available for the action's prosecution.

8 **1. Whatley Drake Has the Experience, Knowledge, and Resources to**
9 **Adequately Represent the Best Interests of the Class**

10 Whatley Drake is a 45-lawyer firm with offices in Birmingham, New York and Boston.
11 The firm has vast experience in consumer class actions. Whatley Drake specializes in complex
12 class action and derivative litigation, including consumer, securities, 401(k), healthcare,
13 insurance, employment and mass tort litigation. *See* Whatley Drake resume, attached to the
14 Mansfield Declaration as Ex. 1. Whatley Drake was recently appointed Co-Lead Counsel in *In re*
15 *Mattel, Inc., Toy Lead Paint Products Liability Litigation*, 07-ml-1897-DSF (C.D. Cal.), a class
16 action brought on behalf of consumers of recalled toys, and *In re Countrywide Financial Corp.*
17 *Mortgage Marketing and Sales Practices Litigation*, Case No. 08-md-1988 DMS (LSP) (S.D.
18 Cal.), a class action brought on behalf of defrauded mortgage borrowers, both of which are
19 brought under California law. *Id.*, ¶3.

20 The work of the firm and its partners has resulted in numerous high profile settlements
21 providing billions of dollars for class members, as well as significant corporate reforms. Joe R.
22 Whatley Jr. has significant experience in leading important consumer class actions. For example,
23 he was one of the lead counsel in the natural polybutylene litigation, which produced one of the
24 largest consumer class action settlements in history. In addition to having argued before the
25 United States Supreme Court, Mr. Whatley also has argued before many Circuit Courts of
26 Appeals, including the Ninth Circuit. *Id.* Proposed Class Counsel have all confirmed they are
27 ready, willing and able to utilize the necessary resources and to use their experience and expertise
28 to obtain the best result possible for the plaintiffs in this litigation. Mansfield Decl., ¶12.

1 **2. The Proposed Members of the Executive Committee All Have the**
2 **Experience, Knowledge, and Resources to Serve in those Roles**

3 Counsel also submit the positions of the following firms on the Executive Committee and
4 as Liaison Counsel will strengthen Lead Class Counsel’s ability to effectively and efficiently
5 streamline and advance the litigation:

6 LITIGATION LAW GROUP
7 Gordon M. Fauth, Jr.

 ROSNER & MANSFIELD LLP
 Alan M. Mansfield

8 For the *Pittman* Action

 HIDEN ROTT & OERTLE LLP
 Michael Ian Rott

9 For the *Gillis* and *Keller* Actions

10 EMERSON POYNTER LLP
11 John G. Emerson
12 Scott E. Poynter
13 Christopher D. Jennings
14 Gina M. Dougherty

 GLANCY BINKOW & GOLDBERG LLP
 Marc L. Godino

 For the *Medway* Action

15 For the *Walters* Action

16 SCHOENGOLD SPORN LAITMAN
17 & LOMETTI, P.C.
18 Jay Saltzman
19 Daniel B. Rehns

 HENINGER GARRISON DAVIS LLC
 W. Lewis Garrison, Jr.

 For the *Smith* Action

20 For the *Tanseco* Action

21 FINKELSTEIN THOMPSON LLP
22 Rosemary M. Rivas (Designated Local
23 Liaison Counsel)

 Burton H. Finkelstein
 Mila Bartos

24 For the *Ashikian* Action

25 These firms all have the breadth of experience and skills necessary to make a significant
26 contribution to this litigation, as demonstrated by their firm resumes, attached to the Mansfield
27 Declaration as Exhibits 1 through 9. The experience of each of the firms is described in more
28 detail in the exhibits and in the Mansfield Declaration. All have been actively involved in this
litigation in terms of continuing investigation, research and discovery, and will provide

1 significant experience resources to the prosecution of this consolidated action. Mansfield Decl.,
2 ¶¶ 3-11.

3 **D. The Proposed Class Counsel Structure Has the Support of All Class**
4 **Plaintiffs' Counsel**

5 Finally, the Court should grant plaintiffs' joint motion because all class plaintiffs with
6 cases pending in this District agree to the leadership structure proposed in this motion. Mansfield
7 Decl., ¶ 12. Courts should approve a proposed leadership structure where the parties agree
8 among themselves as to a leadership structure that best supports the class. *U.S. Trust Co. of N.Y.*
9 *v. Alpert*, 163 F.R.D. 409, 423 (S.D.N.Y. 1995) (“[T]he court should encourage and approve
10 selection of lead counsel by agreement of interested counsel, imposing its own choice only in
11 ‘extraordinary situations.’”); *see also* 2 Herbert B. Newberg and Alba Conte, *Newberg on Class*
12 *Actions* § 9.35 (3d ed. 1992) (“Lead counsel may be designated by consensus of interested
13 counsel, and this selection may be accepted by the court when it makes an appointment. . . . The
14 court should always encourage the parties themselves to agree on lead counsel, while imposing its
15 own choice only in extraordinary circumstances.”).

16 **III. CONCLUSION**

17 For all the foregoing reasons, Plaintiffs respectfully request the Court approve the
18 Proposed Class Counsel structure detailed in the accompanying order.

19 DATED: March 20, 2009

Respectfully submitted,

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28 ***Proposed Lead Interim Class Counsel***

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