

EXHIBIT C

JONES DAY

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RECD JUN 21 2007

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June 15, 2007

VIA EMAIL AND MAIL

Bonny Sweeney, Esq.
Lerach Coughlin Stoa Geller Rudman & Robbins LLP
655 West Broadway, Suite 1900
San Diego, CA 9210-3301

Re: Apple iPod iTunes Antitrust Litigation, Case No. 05-00037-JW

Dear Bonny:

Greg Weston said he was checking with you on the proposal to stipulate to bifurcated discovery rather than requesting a case management conference with Judge Ware. The parties would stipulate to follow the procedure in the Court's November 21, 2006 order in *Charoensak*, which limits discovery to class certification issues but allows plaintiffs to seek, at a case management conference to be held following Apple's opposition to plaintiffs' class certification motion, additional discovery if needed before filing their reply in support of class certification. That order is attached for your convenience.

If you will not stipulate to bifurcated discovery with the procedures set forth above, we are available for a case management conference on August 13.

Assuming discovery is bifurcated, you agreed to withdraw all discovery requests except for Document Request Nos. 10, 11, 19, 20 and 22. Apple responds to your comments on those requests as follows:

Cost, revenue, profit or loss data: We disagree that this information is relevant to class certification. We will provide documents sufficient to show the number of iPods purchased by quarter by model in response to No. 19. The spreadsheets labeled APPLE CHAR 00059-64 are redacted Profit and Loss statements for the iTunes Store. We will provide redacted information from the statements about the number of movies, TV shows and music videos sold. In accord with our previous objections, we will not produce the financial data from the statements. The documents labeled APPLE CHAR 00065-66 were not redacted, but the information was pulled from Profit and Loss statements that will not be produced at this time for the reasons already expressed.

Consumer complaints: We will produce documents responsive to No. 20, located after a reasonable and diligent search, including summaries and analysis to the extent they exist.

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Documents produced in European investigations/Organizational charts: As you admit, these requests “are not obviously class-related.” We object to producing anything not related to class certification.

Regarding the proposed stipulations, the stipulated protective order was entered by the Court on June 13. Attached are our changes to the ediscovery stipulation. We will shortly send you our changes to your proposed expert stipulation.

Very truly yours,



Tracy M. Strong

cc: Andrew Friedman
Roy Katriel
Greg Weston

Enclosures