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7 Attorneys for Defendant
 8 APPLE INC.

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

13 **THE APPLE IPOD iTUNES ANTI-
 14 TRUST LITIGATION**

Case No. C 05 00037 JW

**DECLARATION OF CHARLES
 LANCASTER IN SUPPORT OF
 APPLE'S OPPOSITION TO MOTION
 TO COMPEL PRODUCTION OF
 DOCUMENTS "RELATING TO CLASS
 CERTIFICATION"**

Date: January 16, 2008
 Time: 9:30 a.m.
 Courtroom: 4, 5th Floor
 Judge: Magistrate Judge Richard Seeborg

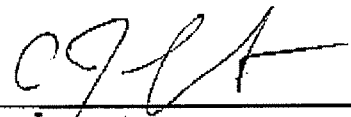
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1 I, Charles Lancaster, hereby declare as follows:

2 1. I have been employed with Apple Inc. (Apple) since May 1998. I presently hold
3 the position of Senior Director, Worldwide Financial Planning & Analysis. I submit this
4 declaration in support of Apple's Opposition to Plaintiffs' Motion to Compel Production of
5 "Documents Relating to Class Certification." I make the statements in this declaration based
6 upon my personal knowledge and corporate records maintained by Apple in the ordinary course
7 of business. If called upon to do so, I could and would testify thereto under oath.

8 2. In its ordinary course of business, Apple analyzes the financial performance of the
9 iPod on a worldwide rather than a regional basis. I estimate that it will require two to three days
10 to obtain summary numbers showing revenue and standard costs for iPods sold in the United
11 States since its introduction in 2001. To obtain "all documents necessary to allow the calculation
12 [of these numbers] for each quarter since the introduction of the iPod" it would likely take about
13 one week.

14 I declare under penalty of perjury under the laws of the United States and California that
15 the foregoing is true and correct. Executed this 20th day of December, 2007.

16
17 By: 
18 Charles Lancaster

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