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11 Attorneys for Plaintiff Stacie Somers

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION
 15

16 THE APPLE IPOD ITUNES ANTI-TRUST)	Case No. C 07-6507 JW
LITIGATION,)	
17 This Document Relates To:)	DECLARATION OF ALREEN
18 <i>Somers v. Apple, Inc.</i> , Case No. C 07-6507 JW,))	HAEGGQUIST IN SUPPORT OF
19)	ADMINISTRATIVE MOTION RE:
20)	SEALING ORDER (CIVIL L.R. 79-5)
_____)	

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1 I, ALREEN HAEGGQUIST, declare as follows:

2 1. I am an attorney duly licensed to practice before this court. I am a partner with the
3 law firm of Zeldes & Haeggquist, LLP, one of the lead counsel for Plaintiff in this action. I have
4 personal knowledge of the matters stated herein and, if called upon, I could and would competently
5 testify thereto.

6 2. I make this declaration in support of Plaintiff's Administrative Motion to File Under
7 Seal portions of Exhibit 1 of the Declaration of Alreen Haeggquist in Support of Plaintiff's Motion
8 for Class Certification and Appointment of Class Counsel ("Haeggquist Declaration") pursuant to
9 Local Rules 7-11 and 79-5(d) and the Stipulation and Protective Order Regarding Confidential
10 Information ("Protective Order") entered March 14, 2008 (Document No. 18).

11 3. The parties entered into the Protective Order, which was signed by the Court on
12 March 14, 2008. Under the Protective Order, the parties may designate certain Discovery Materials,
13 which includes documents produced pursuant to Rule 34 of the Federal Rules of Civil Procedure and
14 interrogatory responses, they deem to be entitled to protection under Rule 26(c) of the Federal Rules
15 of Civil Procedure as "Confidential" and restrict their dissemination and disclosure.

16 4. Defendant has designated the documents it produced pursuant to Rule 34 of the
17 Federal Rules of Civil Procedure and its interrogatory responses as "Confidential" under the
18 Protective Order. These documents and interrogatory responses are discussed in the Affidavit of
19 Gary I. French, Ph.D., which is submitted as Exhibit 1 to the Haeggquist Declaration. Accordingly,
20 portions of Exhibit 1 to the Haeggquist Declaration have been redacted to allow public access to the
21 redacted Haeggquist Declaration and the redacted Haeggquist Declaration is stamped
22 "REDACTED."

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed this 23rd day of February, 2009, at San Diego, California.

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26 s/ Alreen Haeggquist
ALREEN HAEGGQUIST

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 23, 2009.

s/ Helen I. Zeldes
HELEN I. ZELDES

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1 **MAILING INFORMATION FOR A CASE 5:05-CV-00037-JW**

2 **Electronic Mail Notice List**

3 The following are those who are currently on the list to receive e-mail notices for this case.

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1 **Manual Notice List**

2 The following is the list of attorneys who are not on the list to receive e-mail notices for this case
3 (who therefore require manual noticing). You may wish to use your mouse to select and copy this
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