Excerpts from the Full Data Set

The *Keeley Report* contains three exhibits that report only some of the data. By eliminating some data, these graphs create the illusion that the process that generated the data is more chaotic than is actually the case.
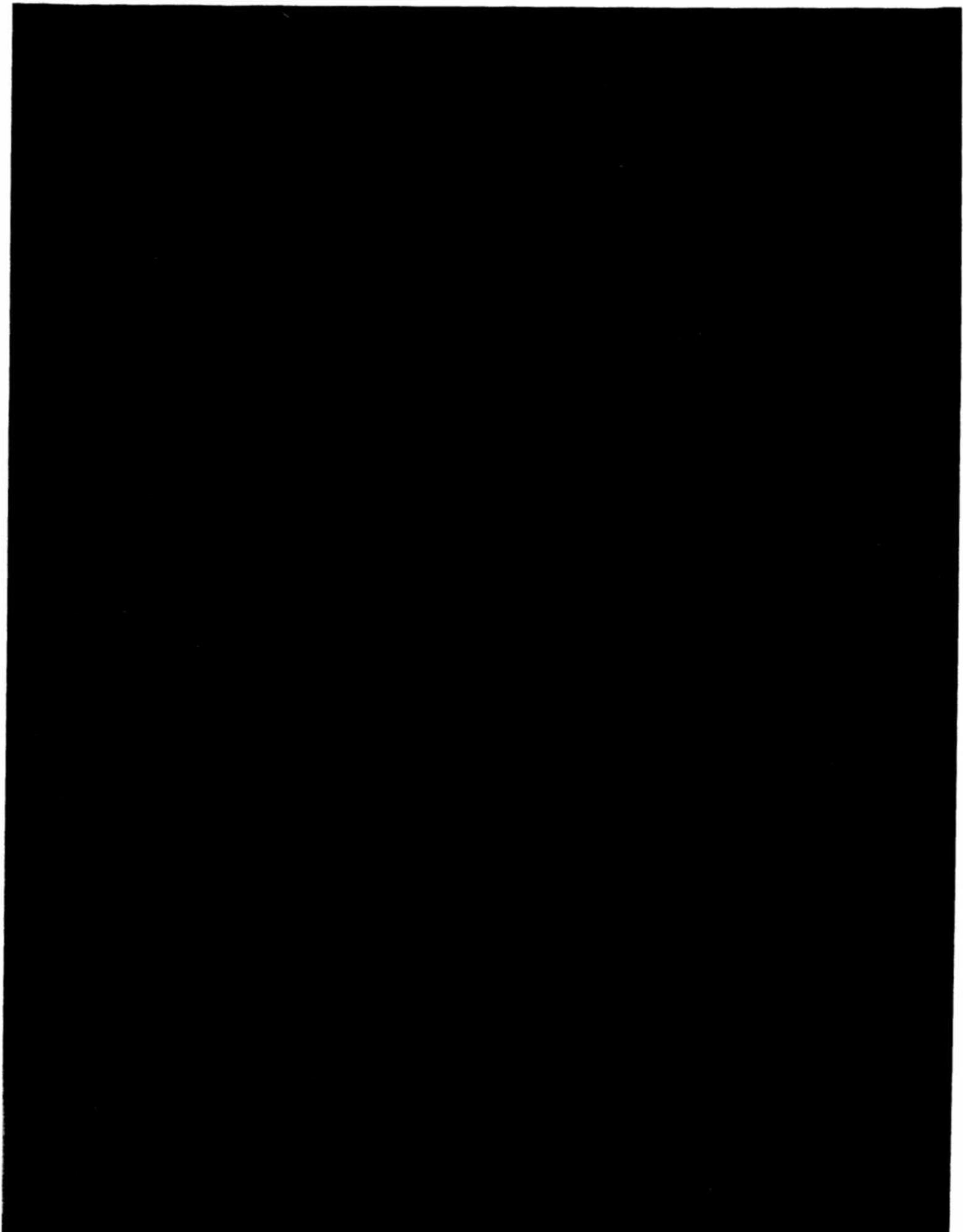
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[61] Tufte, *supra*, pp. 74-75, discusses why this is misleading.

[62] ████████████████████████████████████
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Comparisons with Known but Ignored Differences

The *Keeley Report* often presents comparisons that have known sources of

differences that are not taken into account. ██████████████████████████

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COMMONALITY OF PRICING ACROSS TECHNOLOGIES

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[64] *Keeley Report*, p. 60.
[65] *Ibid.*, p. 16.
[66] *Ibid.*, p. 65. ██

[Redacted content]

[67] *Ibid.*, p. 5.
[68] *Keeley Deposition*, p. 215.
[69] *Keeley Report*, p. 62.

[black redaction bars covering most of the page]

[70] *Keeley Deposition*, pp. 117-18

66

[REDACTED]

Price Correlations among Buyers of the Same Product

The simplest approach to determine whether prices for the same product are common among different purchasers is a correlation test. [REDACTED]

[REDACTED]

Price Regressions for the Products Analyzed by Dr. Keeley

[REDACTED]

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[78] *Keeley Deposition*, p. 123.

[79] See Ernst R. Berndt, "The Measurement of Quality Change," Ch. 4 of *The Practice of Econometrics: Classic and Contemporary*, Addison-Wesley, 1991; Ariel Pakes, "A Reconsideration of Hedonic Price Indices with an Application to PCs," *American Economic Review* Vol. 93, No. 5 (December 2003), pp. 1578-96; Patrick Bajari and Lanier Benkard, "Demand Estimation with Heterogeneous Consumers and Unobserved Product Characteristics: A Hedonic Approach," *Journal of Political Economy* Vol. 113, No. 6 (December 2005), pp. 1239-76; and Paul D. Chwelos, Ernst R. Berndt, and Iain M. Cockburn, "Faster, Smaller, Cheaper: A Hedonic Price Analysis of PDAs," *Applied Economics* Vol. 40, No. 22 (November 2008), pp. 2839-56.

Price Regressions Pooling All Products
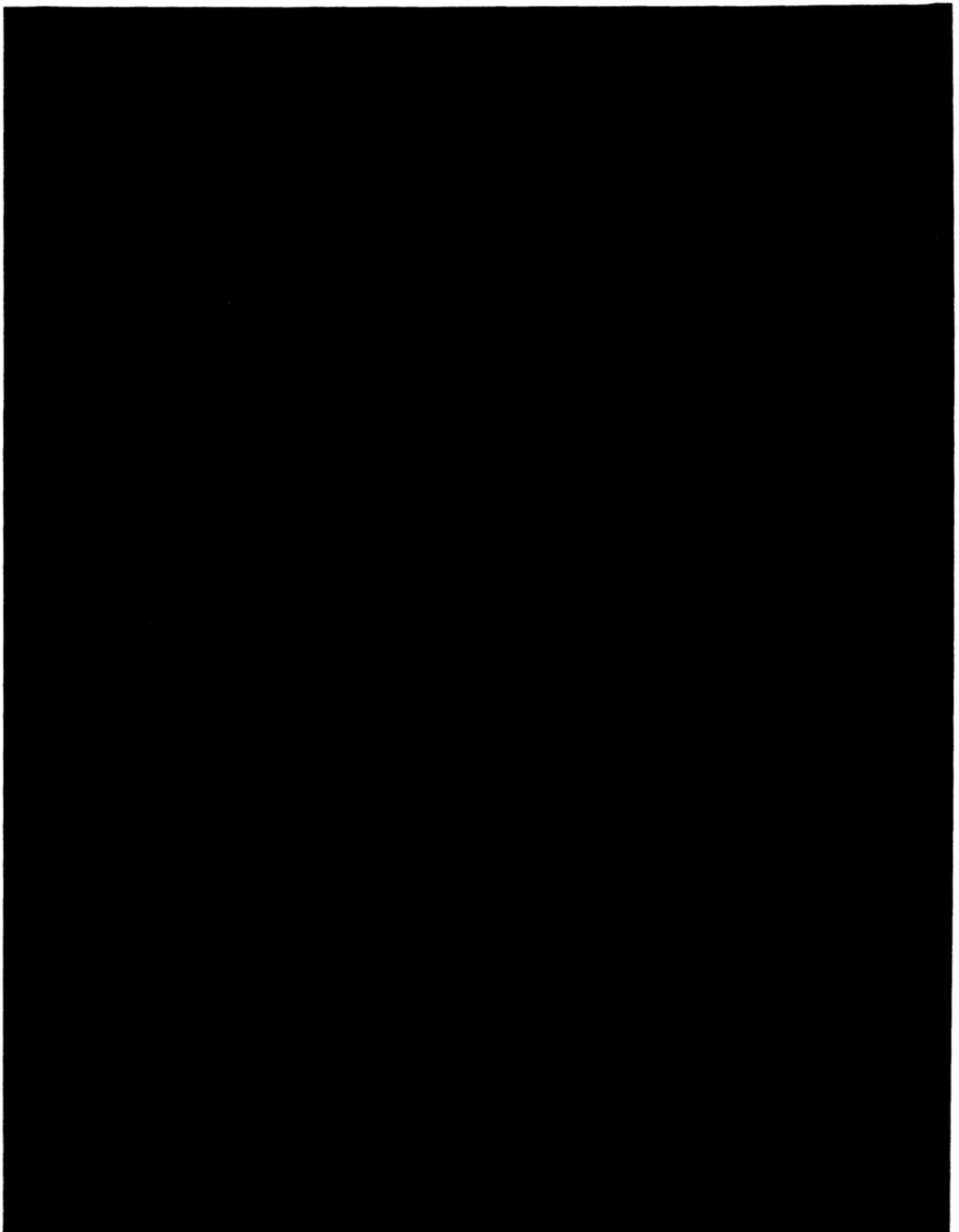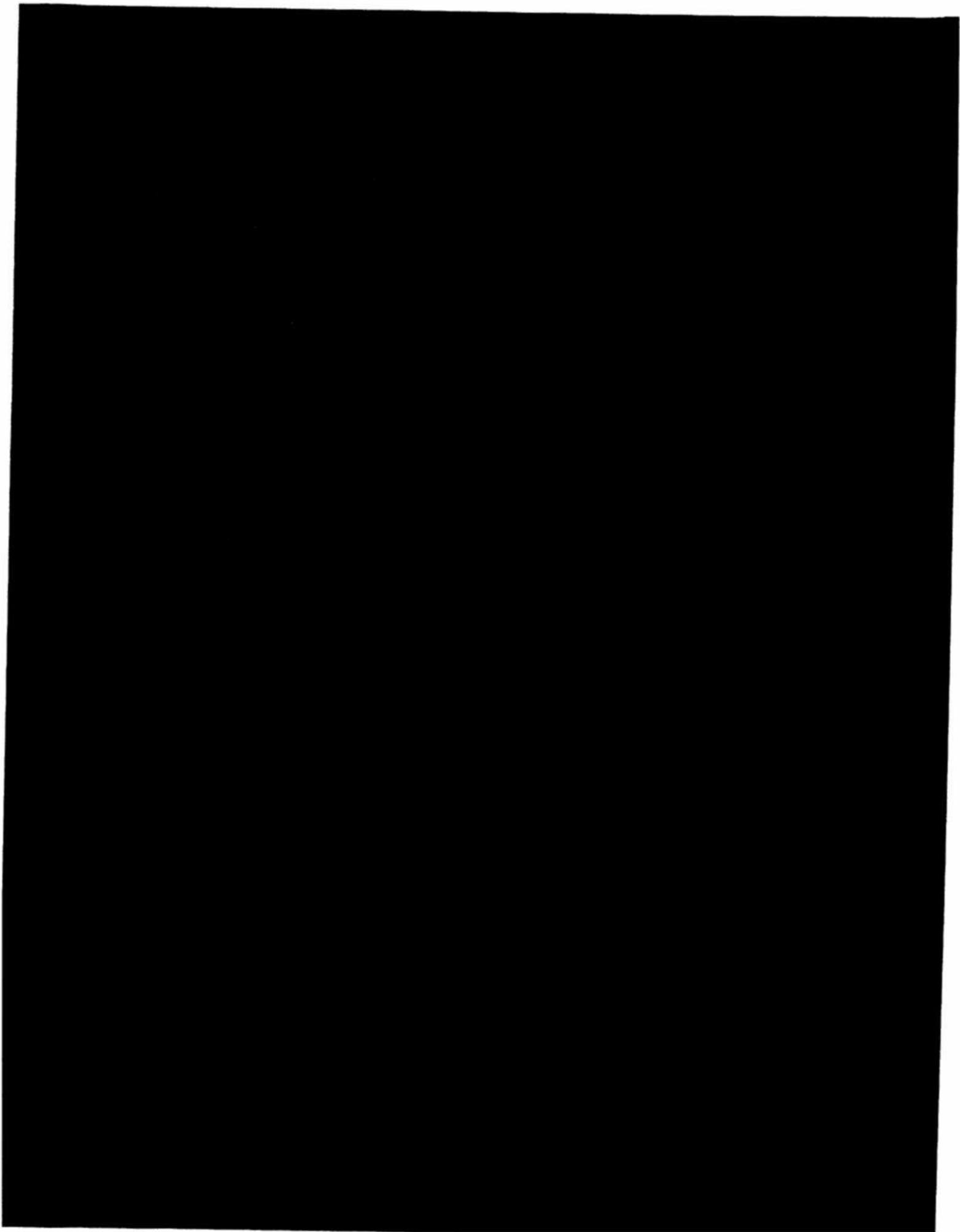
[81] *Keeley Deposition*, p. 123.
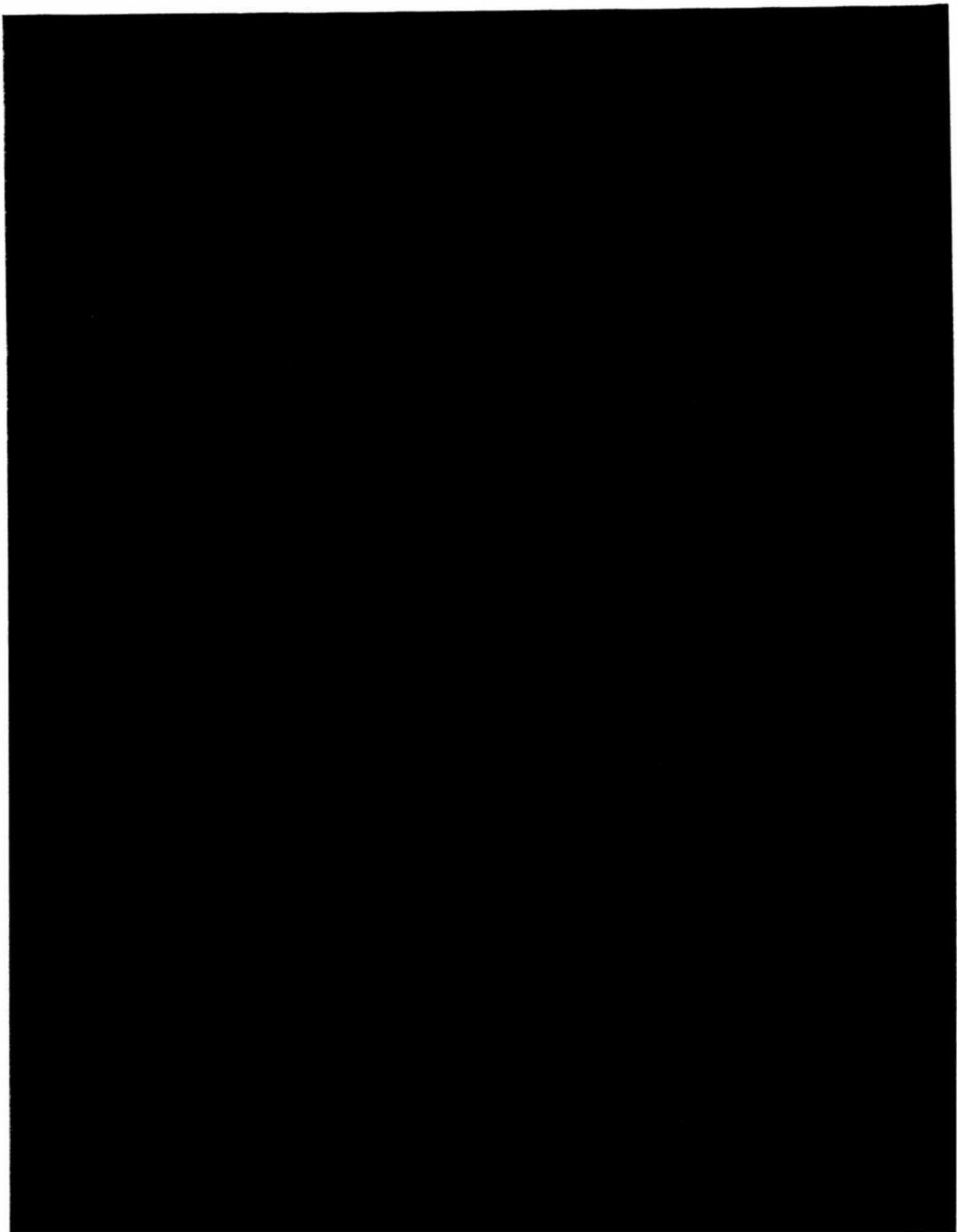[82] *Ibid.*, pp. 212-13.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge and belief. Executed on September 22, 2009, at Stanford, California.
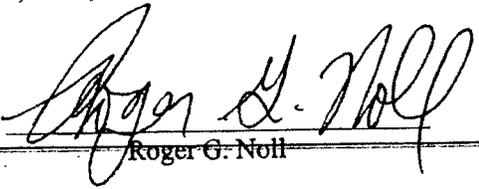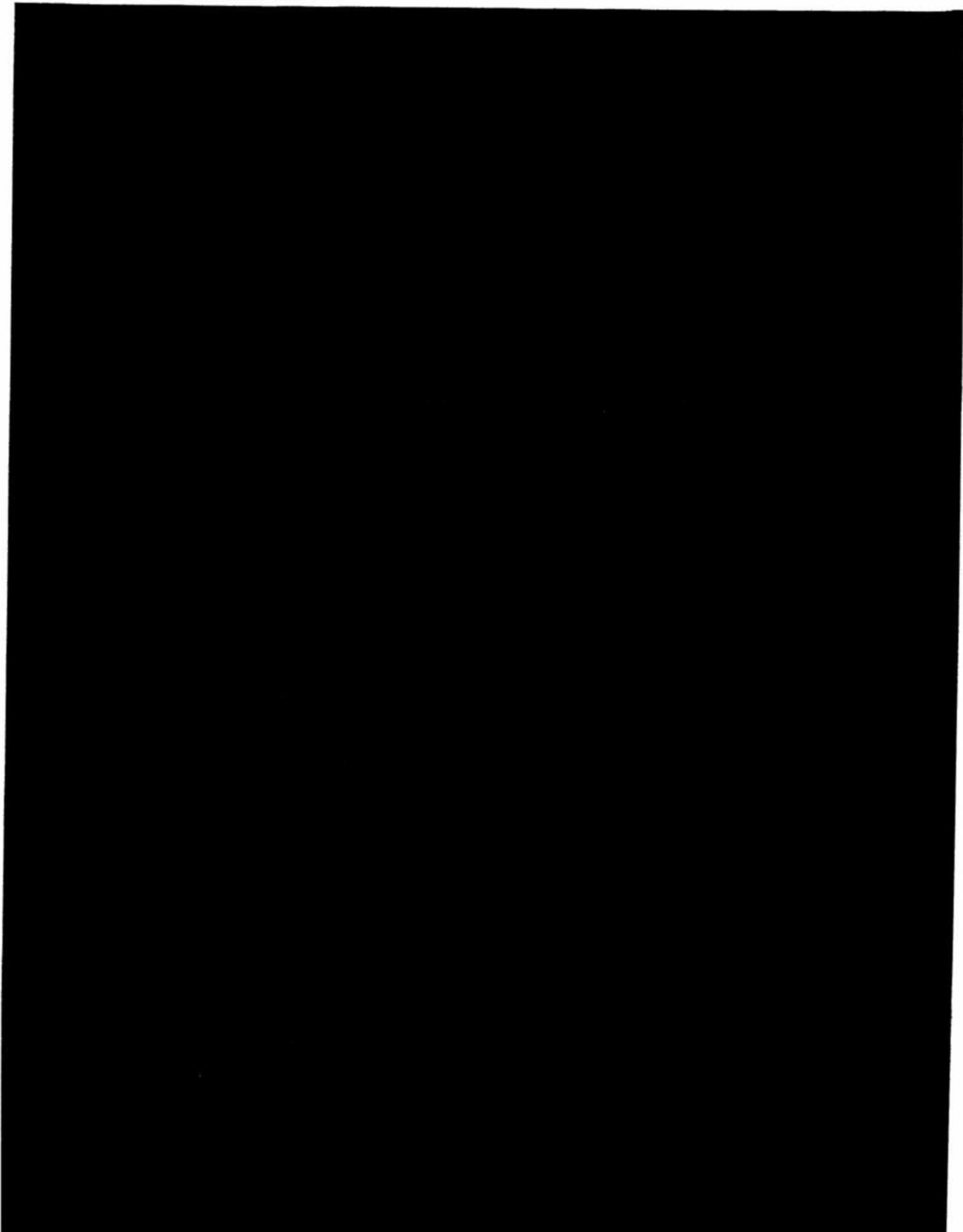
Roger G. Noll
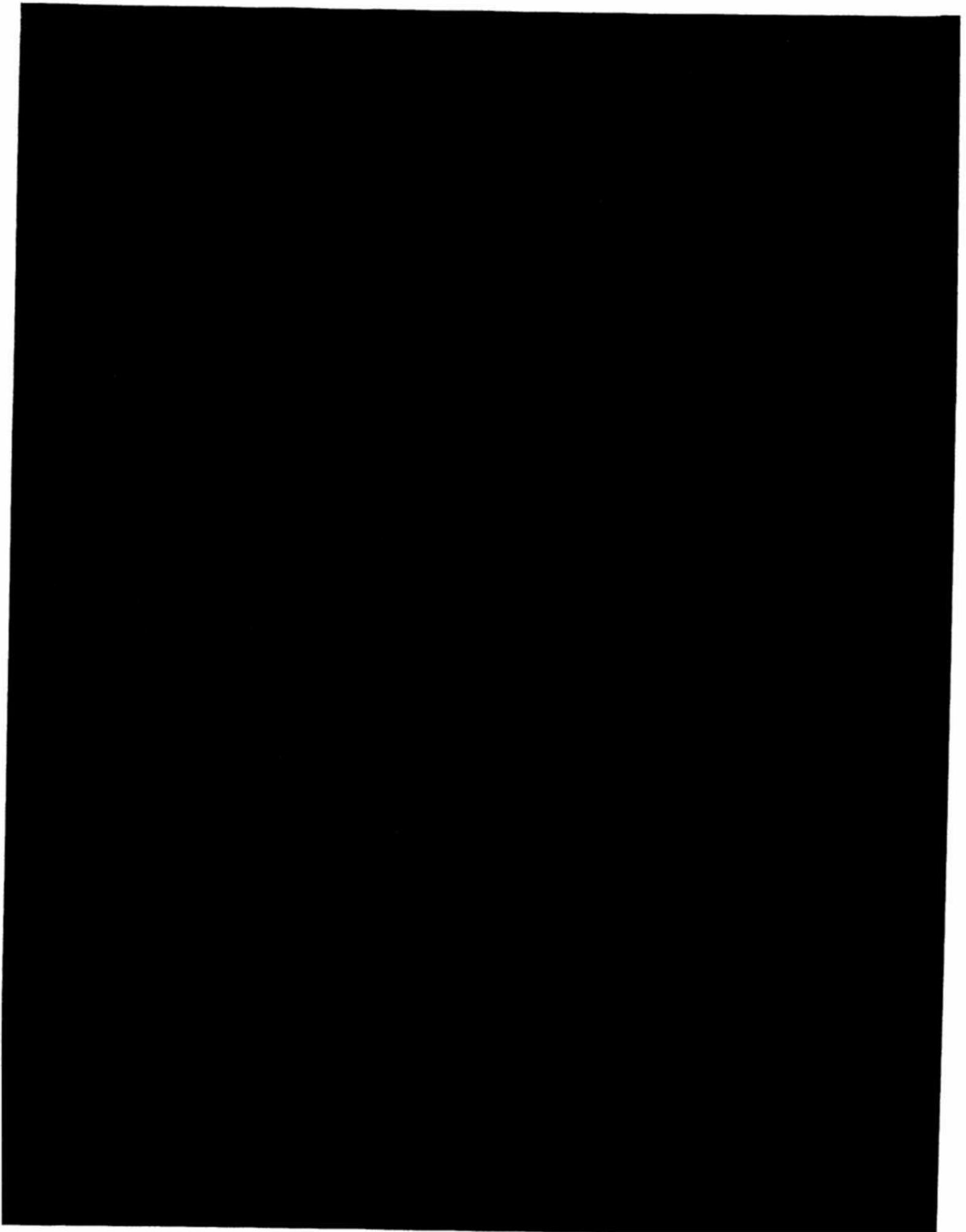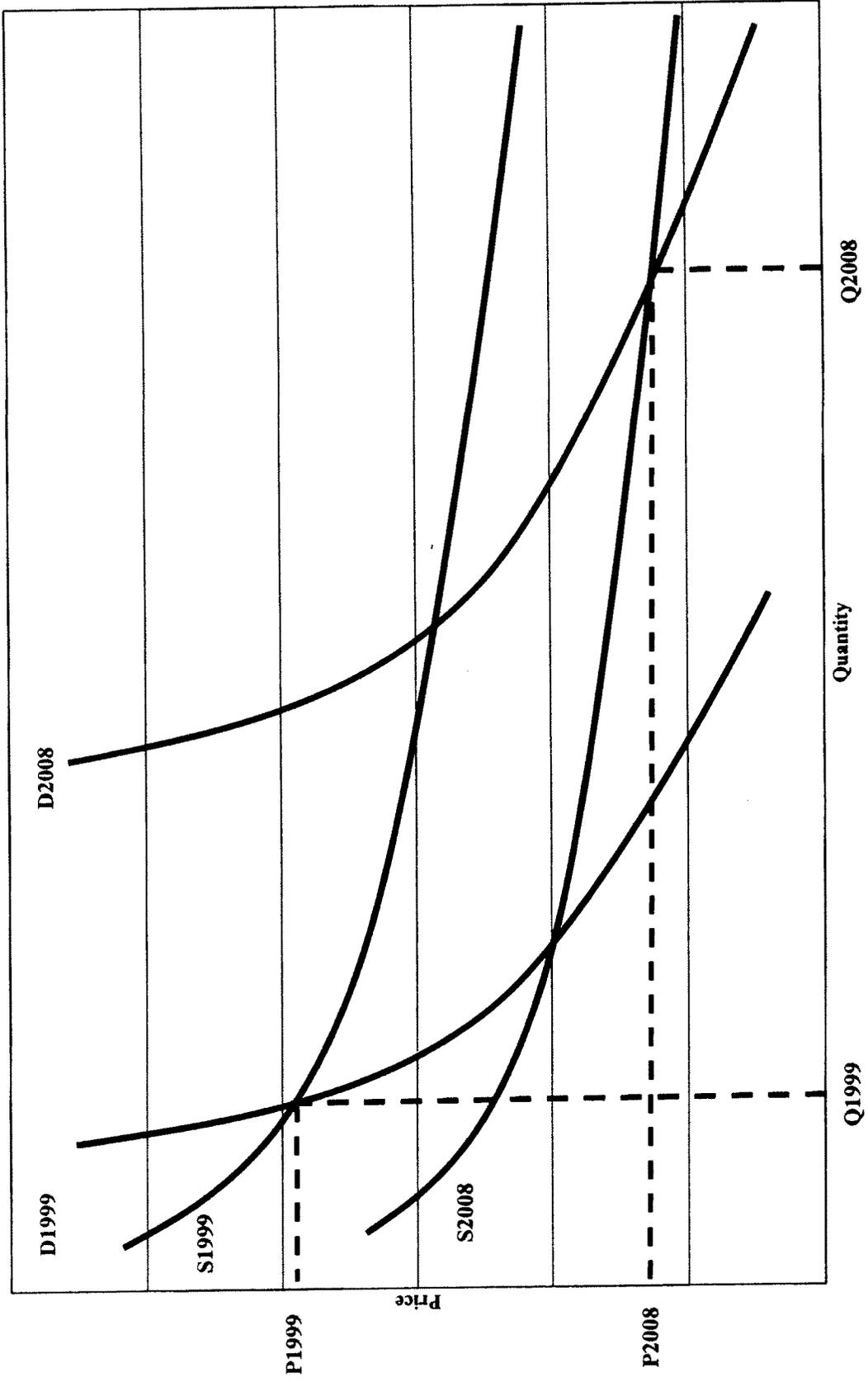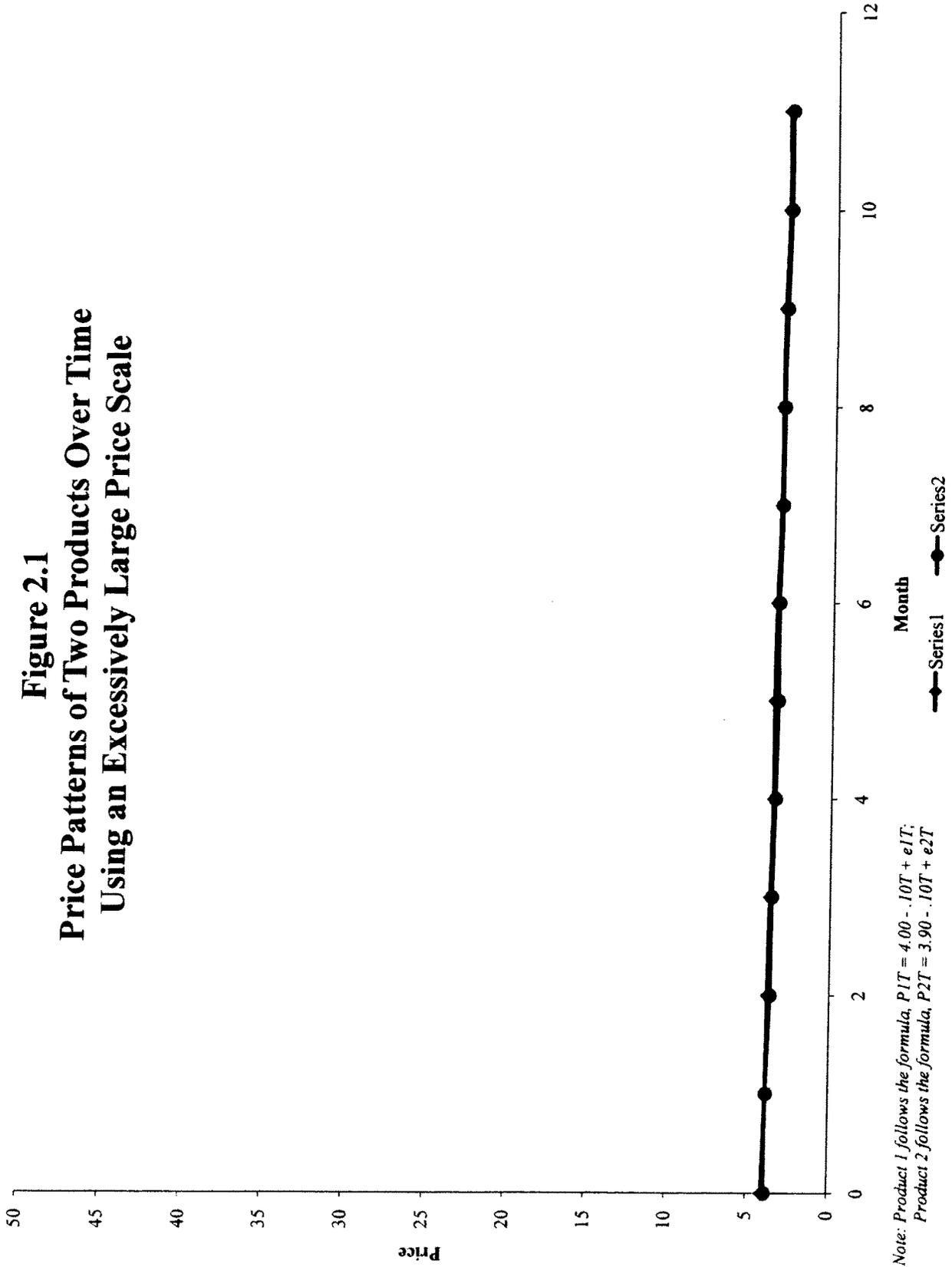
Figure 1
Elasticity Example

Figure 2.1
Price Patterns of Two Products Over Time
Using an Excessively Large Price Scale

Month

Series1 Series2

Note: Product 1 follows the formula, $P1T = 4.00 - .10T + e1T$;
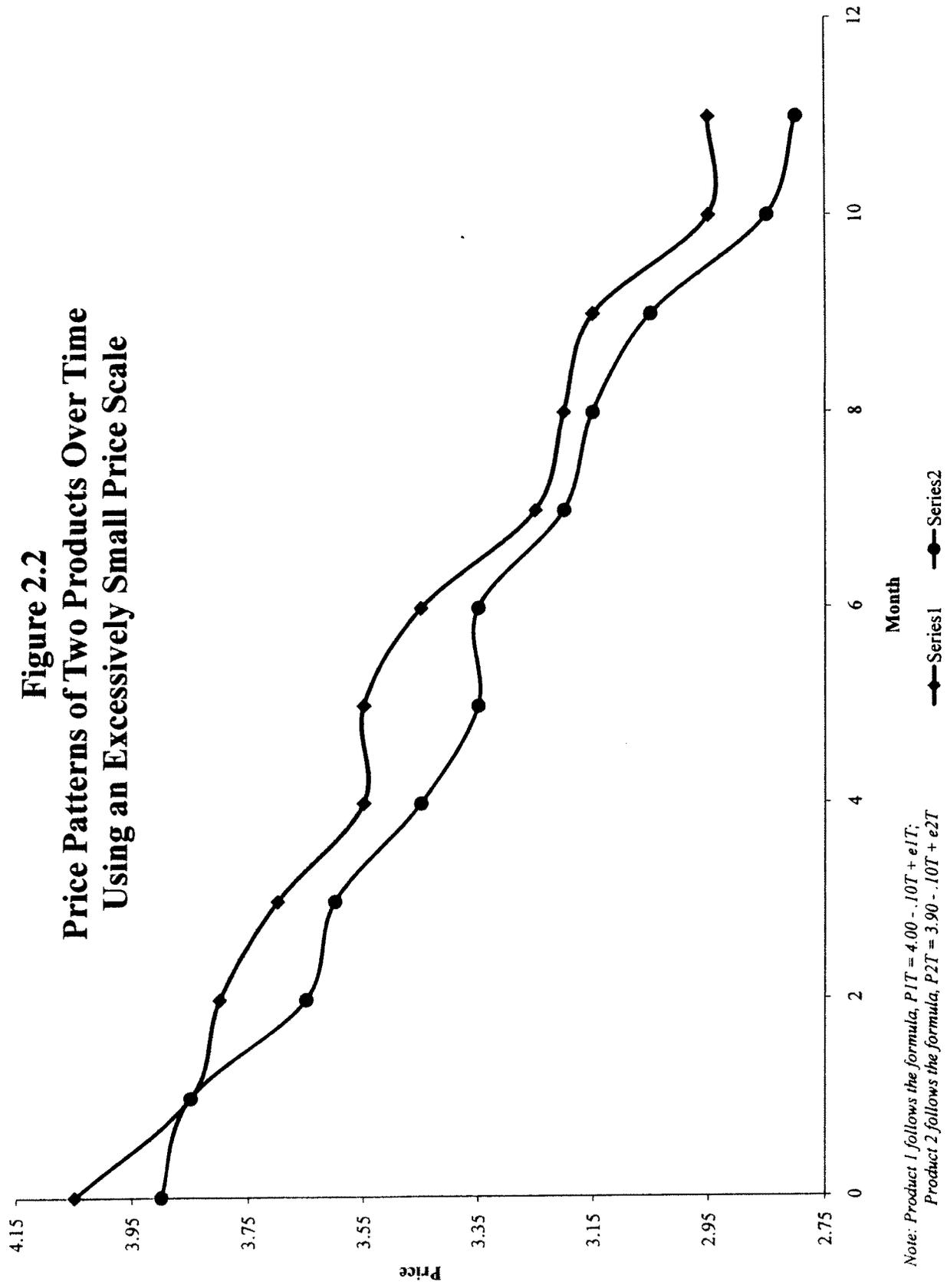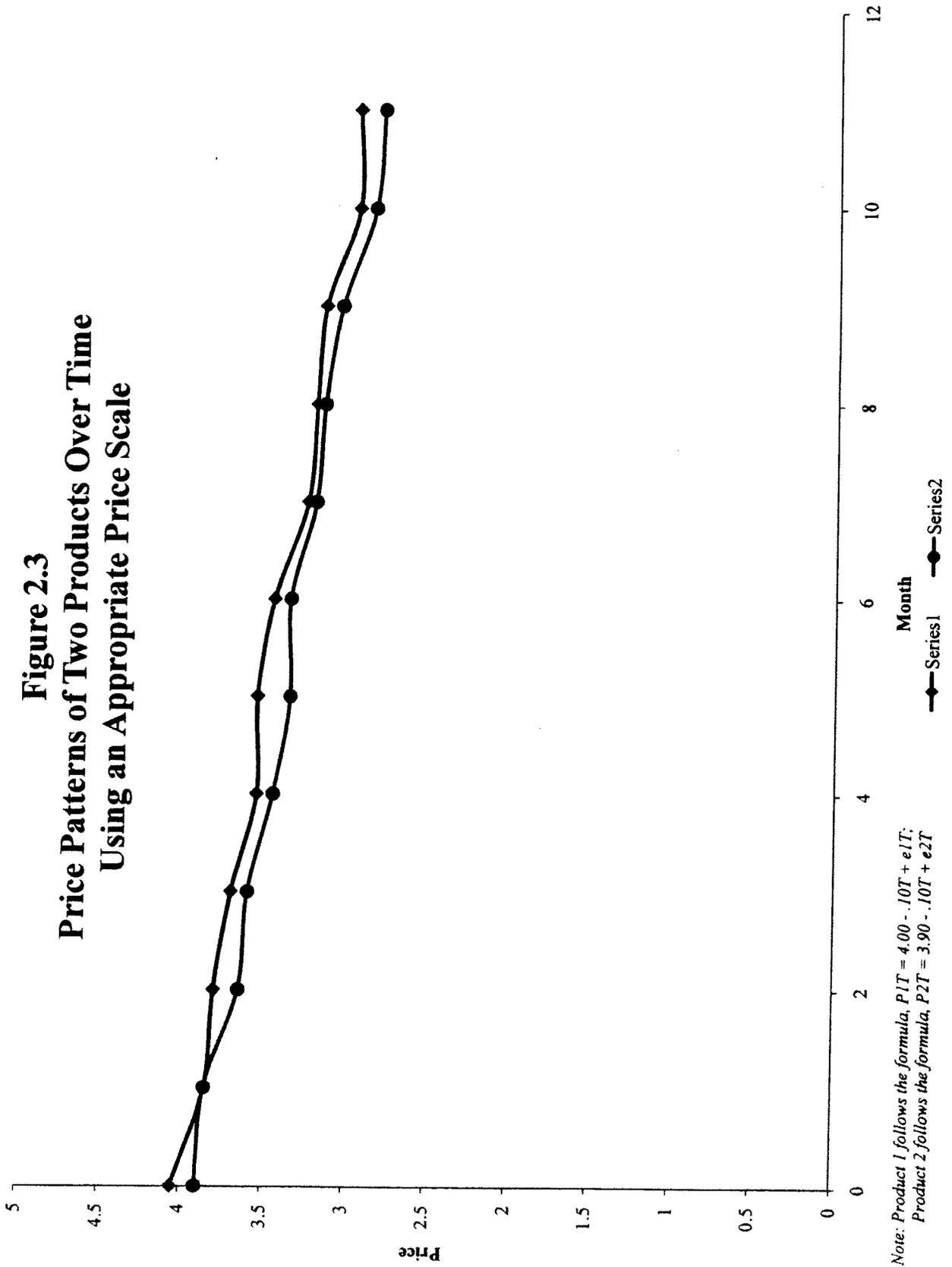*Product 2 follows the formula, $P2T = 3.90 - .10T + e2T$*

Figure 2.2
Price Patterns of Two Products Over Time
Using an Excessively Small Price Scale

Note: Product 1 follows the formula, P1T = 4.00 - .10T + e1T;
Product 2 follows the formula, P2T = 3.90 - .10T + e2T

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Figure 2.3
Price Patterns of Two Products Over Time
Using an Appropriate Price Scale

Note: Product 1 follows the formula, P1T = 4.00 - .10T + e1T;
Product 2 follows the formula, P2T = 3.90 - .10T + e2T

Exhibits 10N through 10N.5(a)

have been redacted

Exhibit 11N

has been redacted

Exhibit 19.2N

has been redacted

Exhibits 19.5N and 19.6N

have been redacted

Exhibits 20N.1 through 20N.3

have been redacted

Exhibits 30.1N and 30.2N

have been redacted

Exhibit 31N

has been redacted

Exhibits 19R.1 and 19R.2

have been redacted

Exhibits 21R.1 and 21R.2

have been redacted

Exhibits 23R.1 and 23R.2

have been redacted

Exhibits 25R.1 and 25R.2

have been redacted

Exhibits 26R.1 and 26R.2

have been redacted

Exhibit 27R

has been redacted

Exhibits B1.2 and B1.10

have been redacted

Exhibits B2.2 and B2.24

have been redacted

Exhibit B3.1

has been redacted

Exhibits B4.2 and B4.8

have been redacted

Exhibits B5.12 and B5.17

have been redacted

Exhibits B6.3 and B6.10

have been redacted

Reply Exhibits D.1 through D.4

have been redacted

DECLARATIONS

Declaration of Michael C. Keeley, Ph.D, In Support of Defendants' Joint Opposition to Direct Purchaser Plaintiffs' Motion for Class Certification, October 20, 2009

Declaration of Erik Aldana in Support of Defendants' Joint Opposition to Direct Purchaser Plaintiff's Motion for Class Certification, October 20, 2009

Declaration of Juseon Kim in Opposition to Class Certification, October 20, 2009

Defendants' Joint Opposition to Direct Purchaser Plaintiff Timothy Chanda's Motion for Class Certification, September 1, 2009

DEPOSITIONS

Erik Aldana, August 20, 2009

Doug Hauck, August 21, 2009

Michael Keeley, September 9, 2009

Juseon Kim, August 19, 2009

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Chwelos, Paul D., Ernst R. Berndt, and Iain M. Cockburn, "Faster, Smaller, Cheaper: A Hedonic Price Analysis of PDAs." *Applied Economics* Vol. 40, No. 22 (November 2008), pp. 2839-56.

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LETTERS
Letter from Casandra L. Thomson to Judith A. Zahid, September 14, 2009
Letter to J. Zahid from Vincent Panhuys, September 15, 2009
Letter to J. Zahid from Matthew Warren, September 16, 2009
Letter to J. Zahid from Rianne Rocca, September 16, 2009
Letter from Ryan Padden to J. Zahid, September 17, 2009

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http://hsa.hynix.com/us_sa/product/mobile.jsp

DATA
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HSA_NAND0001084 HIGHLY CONFIDENTIAL -- ATTORNEYS EYES ONLY.xls

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