

1 I, PAULA M. ROACH, hereby declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the State of
3 California. I am associated with the law firm of Coughlin Stoia Geller Rudman & Robbins LLP,
4 Co-Lead Class Counsel of record for Plaintiffs Melanie Tucker, Mariana Rosen, and Somtai Troy
5 Charoensak in this action. I have personal knowledge of the matters stated herein, and, if called
6 upon, I could and would competently testify thereto.

7 2. I submit this declaration in support of Plaintiffs' Administrative Motion to File Under
8 Seal Portions of Plaintiffs' Motion to Compel Further Response from Defendant Apple, Inc. and
9 Exhibits 11, 17, 22, 23, 24, 27, 30, 35 ("Exhibits") to the Roach Declaration pursuant to Local Rule
10 79-5(b)-(c).

11 3. The requested relief is necessary and narrowly tailored to protect the confidentiality
12 of Apple's commercially sensitive business information, including undisclosed internal emails. The
13 confidential information has been redacted from the Motion and Exhibits to allow public access to
14 the redacted Motion and Exhibits. The redacted Motion and Exhibits are marked "REDACTED."

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct. Executed this 5th day of January, 2010, at San Diego, California.

17

18

s/ Paula M. Roach

PAULA M. ROACH

19

20 S:\CasesSD\Apple Tying\secy\DEC00063931.doc

21

22

23

24

25

26

27

28

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2010, 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 January 5, 2010.

s/ PAULA M. ROACH
PAULA M. ROACH

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)
E-mail:proach@[csgrr.com](mailto:proach@csgrr.com)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Mailing Information for a Case 5:05-cv-00037-JW

Electronic Mail Notice List

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

- **Francis Joseph Balint , Jr**
fbalint@bffb.com
- **Michael D Braun**
service@braunlawgroup.com
- **Michael D. Braun**
service@braunlawgroup.com,clc@braunlawgroup.com
- **Todd David Carpenter**
tcarpenter@bffb.com
- **Andrew S. Friedman**
rcreech@bffb.com,afriedman@bffb.com
- **Alreen Haeggquist**
alreenh@zhlaw.com,judyj@zhlaw.com
- **Roy A. Katriel**
rak@katriellaw.com,rk618@aol.com
- **Thomas J. Kennedy**
tkennedy@murrayfrank.com
- **David Craig Kiernan**
dkiernan@jonesday.com,lwong@jonesday.com,valdajani@jonesday.com
- **Thomas Robert Merrick**
tmerrick@csgrr.com
- **Caroline Nason Mitchell**
cnmitchell@jonesday.com,mlandsborough@jonesday.com,ewallace@jonesday.com
- **Robert Allan Mittelstaedt**
ramittelstaedt@jonesday.com,ybennett@jonesday.com
- **Brian P Murray**
bmurray@murrayfrank.com
- **Paula Michelle Roach**
proach@csgrr.com
- **Elaine A. Ryan**

eryan@bffb.com,pjohnson@bffb.com

- **Jacqueline Sailer**
jsailer@murrayfrank.com
- **Adam Richard Sand , Esq**
invalidaddress@invalidaddress.com
- **Michael Tedder Scott**
michaelscott@jonesday.com,gwayte@jonesday.com
- **Craig Ellsworth Stewart**
cestewart@jonesday.com,mlandsborough@jonesday.com
- **John J. Stoia , Jr**
jstoia@csgrr.com
- **Tracy Strong**
invalidaddress@invalidaddress.com
- **Bonny E. Sweeney**
bonnys@csgrr.com,proach@csgrr.com,E_file_sd@csgrr.com,christinas@csgrr.com
- **Helen I. Zeldes**
helenz@zhlaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)