

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' Memorandum in Opposition to Apple's Motion to Dismiss or,
9 Alternatively, for Summary Judgment ("Motion"), Portions of the Roach Declaration ("Roach
10 Declaration"), and Exhibits 2, 3, 4, 5, 7, 9 ("Exhibits") to the Merrick Declaration pursuant to Local
11 Rule 79-5(b)-(c).

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

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct. Executed this 22nd day of March, 2010, at San Diego, California.

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s/ Paula M. Roach

PAULA M. ROACH

1 CERTIFICATE OF SERVICE

2 I hereby certify that on March 22, 2010, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on March 22, 2010.

9
10 s/ Paula M. Roach
PAULA M. ROACH

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Manual Notice List

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- (No manual recipients)