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13 Co-Lead Counsel for Plaintiffs

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 15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN JOSE DIVISION

18 THE APPLE IPOD ITUNES ANTI-TRUST ) LITIGATION )	Lead Case No. C-05-00037-JW(HRL)
19 _____ ) )	<u>CLASS ACTION</u>
20 This Document Relates To: ) )	DECLARATION OF BONNY E. SWEENEY IN
21 ALL ACTIONS. ) )	SUPPORT OF PLAINTIFFS'
22 _____ ) )	ADMINISTRATIVE MOTION TO FILE
23 )	UNDER SEAL PORTIONS OF PLAINTIFFS'
24 )	OPPOSITION TO APPLE, INC.'S MOTION
25 )	FOR PROTECTIVE ORDER PREVENTING
26 )	DEPOSITION OF STEVE JOBS AND
27 )	EXHIBITS 1-4 AND 6-11 TO THE BERNAY
28 )	DECLARATION PURSUANT TO LOCAL
	RULE 79-5(b) AND (c)

JUDGE: Hon. Howard R. Lloyd  
 DATE: January 18, 2011  
 TIME: 10:00 a.m.  
 CTRM: 2 – 5th Floor

1 I, BONNY E. SWEENEY, 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 a member of the law firm of Robbins Geller Rudman & Dowd LLP, Co-Lead Class  
4 Counsel of record for plaintiffs Melanie Tucker, Mariana Rose, and Somtai Troy Charoensak in this  
5 action. I have personal knowledge of the matters stated herein, and, if called upon, I could and  
6 would competently testify thereto.

7 2. I submit this declaration in support of plaintiffs' Administrative Motion to File Under  
8 Seal Portions of Plaintiffs' Opposition to Apple, Inc.'s Motion for Protective Order Preventing  
9 Deposition of Steve Jobs ("Opposition") and Exhibits 1-4 and 6-11 ("Exhibits") to the Bernay  
10 Declaration pursuant to Local Rule 79-5(b) and (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 Opposition and Exhibits to allow public access  
14 to the redacted Opposition and Exhibits. The redacted Opposition and Exhibits are marked  
15 "REDACTED."

16 I declare under penalty of perjury under the laws of the United States of America that the  
17 foregoing is true and correct. Executed this 20th day of December, 2010, at San Diego, California.

18  
19 s/ Bonny E. Sweeney  
BONNY E. SWEENEY

1 CERTIFICATE OF SERVICE

2 I hereby certify that on December 20, 2010, I authorized the electronic filing of the foregoing  
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to  
4 the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I  
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-  
6 CM/ECF 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 December 20, 2010.

9 s/ Bonny E. Sweeney  
10 BONNY E. SWEENEY

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### **Manual Notice List**

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- (No manual recipients)