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15
                    UNITED STATES DISTRICT COURT
16
                  NORTHERN DISTRICT OF CALIFORNIA
17
                         SAN JOSE DIVISION
18

19 THE APPLE IPOD ITUNES ANTI-TRUST LITIGATION	) Lead Case No. C-05-00037-JW(HRL)
20	) CLASS ACTION
21 This Document Relates To:	) DECLARATION OF PAULA M. ROACH IN
22 ALL ACTIONS.	) SUPPORT OF PLAINTIFFS' MOTION AND
23	) SUPPORTING MEMORANDUM FOR
24	) LEAVE TO FILE ADDITIONAL
	) EVIDENCE IN SUPPORT OF THEIR
	) OPPOSITION TO APPLE, INC.'S MOTION
	) FOR PROTECTIVE ORDER PREVENTING
	) THE DEPOSITION OF STEVE JOBS

25   JUDGE: Hon. Magistrate Howard R. Lloyd
                                DATE: January 18, 2011
26   TIME: 10:00 a.m.
                                CTRM: 2 – 5th Floor
27

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592386_1

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

2   1.   I am an attorney duly licensed to practice before all the courts of the state of

3   California. I am associated with the law firm of Robbins Geller Rudman & Dowd LLP, Co-Lead

4   Class Counsel of record for Plaintiffs Melanie Tucker, Mariana Rosen, and Somtai Troy Charoensak

5   in this action. I have personal knowledge of the matters stated herein, and, if called upon, I could

6   and would competently testify thereof.

7   2.   Apple filed its Motion for Protective Order Preventing the Deposition of Steve Jobs

8   on December 9, 2010. Plaintiffs filed their opposition on December 20, 2010. On the same day, at

9   7:30 p.m., Apple produced additional documents in response to various Plaintiffs' discovery

10   requests. Plaintiffs were unable to review this production before filing their opposition. On

11   January 4, 2011, Apple filed its reply in support of its motion.

12   3.   After review of Apple's December 20, 2010 production, Plaintiffs discovered several

13   important documents further demonstrating Steve Jobs' unique and non-duplicative knowledge of

14   the facts relevant to this case.

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 7th day of January, 2011, at San Diego, California.

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18   s/ Paula M. Roach
                                                        PAULA M. ROACH
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DECL OF ROACH IN SUPP OF PLFS' MOT & SUPP MEM FOR LEAVE TO FILE ADD'L EVID. IN
SUPP OF THEIR OPPO TO APPLE, INC.'S MOT FOR PROTECT. ORDER PREVENTING THE DEPO
OF STEVE JOBS - C-05-00037-JW(HRL)   - 1 -

1	<u>CERTIFICATE OF SERVICE</u>
2	I hereby certify that on January 7, 2011, 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 January 7, 2011.

s/ Paula M. Roach
PAULA M. ROACH

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592386_1

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Manual Notice List

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- (No manual recipients)