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Attorneys for Defendant
APPLE INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

**THE APPLE IPOD iTUNES
ANTITRUST LITIGATION**

Case No. C 05 00037 JW (HRL)

[CLASS ACTION]

**STIPULATION AND [PROPOSED]
ORDER REGARDING APPLE INC'S
MOTION TO COMPEL RESPONSES TO
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

WHEREAS, on December 27, 2010, Apple Inc. moved this Court for an order compelling Plaintiffs to provide complete verified responses to Apple's First Interrogatory Nos. 1-18 and 21-22 and to produce all documents in response to Apple's First Request for Production of Documents Nos. 1-2 and 6;

WHEREAS, Plaintiffs agree to provide complete, substantive answers to Apple's First Interrogatory Nos. 1-18 and 21-22 on or before March 7, 2011;

1 WHEREAS, Plaintiffs also agree to produce all relevant, nonprivileged documents in
2 response to Apple's Request for Production of Documents Nos. 1-2 on or before March 7, 2011;

3 WHEREAS, based on Plaintiffs' agreement to provide complete, substantive answers and
4 documents by March 7, 2011, Apple agrees that the hearing on its motion to compel is no longer
5 necessary;

6 WHEREAS, stipulate and agree to the following Stipulated Order:

7 IT IS THEREFORE STIPULATED by the parties, through undersigned counsel, that
8 Plaintiffs shall:

9 1. Provide complete, substantive answers to Apple's First Interrogatories, Nos. 1-18
10 and 22 no later than March 7, 2011; and

11 2. Produce all relevant, nonprivileged documents in response to Apple's First
12 Requests for Production of Documents, Nos. 1 and 2 no later than March 7, 2011.

13 It is hereby **STIPULATED**:

14 Dated: January 17, 2011

Robbins, Geller, Rudman & Dowd LLP

16 By: /s/

17 Alexandra S. Bernay

18 Counsel for Direct Purchaser Plaintiffs

19 Dated: January 17, 2011

Jones Day

21 By: /s/

22 David C. Kiernan

23 Counsel for Defendant Apple Inc.

24
25 **IT IS SO ORDERED.**

26 Dated: _____

27 James Howard R. Lloyd
28 United States Magistrate Judge