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8 Attorneys for Defendant
 APPLE INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

14 THE APPLE IPOD iTUNES ANTI-TRUST
 LITIGATION.

Case No. C 05-00037 JW (HRL)

[CLASS ACTION]

**DECLARATION OF MICHAEL T.
 SCOTT IN SUPPORT OF APPLE INC.'S
 RESPONSE TO PLAINTIFFS'
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL**

20 1. I am an associate in the law firm of Jones Day, located at 555 California Street,
 21 26th Floor, San Francisco, CA 94104. I submit this declaration in support of Apple's Response
 22 to Plaintiffs' Administrative Motion to File Under Seal (Dkt. 475, "Administrative Motion"). The
 23 facts stated in this declaration are true and based upon my own personal knowledge, and if called
 24 to testify to them, I would competently do so.

25 2. The relief requested in the Administrative Motion is necessary and narrowly
 26 tailored to protect Apple's confidential business information. Plaintiffs' Motion for Class
 27 Certification (Dkt. 477) and the Sweeney (Dkt. 478) and Noll (Dkt. 479) declarations in support
 28 thereof contain highly confidential information regarding iPod and iTunes Store pricing,

Decl. ISO Apple Inc.'s Administrative Motion to Seal
 C 05 00037 JW (HRL)

1 including pricing strategy and information considered by Apple when setting iPod and iTunes
2 Store prices; information regarding costs of manufacturing and selling iPods and costs associated
3 with the sale of music through the iTunes Store; and information regarding Apple's margins on
4 iPod and iTunes Store sales.

5 3. Motions to seal similar information have been granted previously in this case. See
6 Dkt. 184, 247, 291, 340, 353, 422.

7 4. Attached as Exhibit 1 is a true and correct copy of the Declaration of Steven Leung
8 in Support of Apple's Motion to File Under Seal, Dkt. 233.

9 5. Attached as Exhibit 2 is a true and correct copy of the Declaration of Eddy Cue in
10 Support of Defendant's Response to Plaintiffs' Administrative Motion to Seal, Dkt. 289.

11 6. Attached as Exhibit 3 is a true and correct copy of the Declaration of Eddy Cue in
12 Support of Defendant's Response to Plaintiffs' Administrative Motion to Seal, Dkt. 318.

13 7. Attached as Exhibit 4 is a true and correct copy of the Declaration of Jeffrey
14 Robbin in Support of Apple's Administrative Motion to Seal, Dkt. 328.

15 8. Attached as Exhibit 5 is a true and correct copy of the Declaration of Eddy Cue in
16 Support of Defendant's Response to Plaintiffs' Administrative Motion to Seal, Dkt. 350.

17 9. Attached as Exhibit 6 is a true and correct copy of the Declaration of Eddy Cue in
18 Support of Defendant's Response to Plaintiffs' Amended Administrative Motion to File Under
19 Seal, Dkt. 409.

20 10. Attached as Exhibit 7 is a true and correct copy of the Declaration of Mark
21 Buckley in Support of Apple's Response to Plaintiffs' Administrative Motion to File Under Seal,
22 Dkt. 454.

23 Executed this 25th day of January, 2011 in San Francisco, California.

24 /s/Michael T. Scott

25 Michael T. Scott

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27 SFI-658305v1