

EXHIBIT A

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Class Definition

All persons or entities, including resellers, in the United States (excluding federal, state and local governmental entities, Apple, its directors, officers and members of their families) who purchased an iPod, directly from Apple by way of Apple's U.S. retail stores, U.S. online portal or through Apple's U.S. reseller channel between September 12, 2006 and March 31, 2009 ("Class Period"). The specific models of iPods covered by the Class Definition are listed below as follows:

I. iPod Standard, Classic, Special Models

iPod (5th generation) 30 GB

iPod (5th generation) 80 GB

iPod U2 Special Edition 30 GB

iPod Classic 120 GB

iPod Classic 80 GB

iPod Classic 160 GB

iPod (5th generation) 60 GB (Apple shipped thousands of the iPod (5th generation) 60 GB models during the Class Period even though the product was discontinued in September 2006 according to reseller transaction data. Those iPod (5th generation) 60 GB models purchased between September 12, 2006 and March 31, 2009 are included in the Class Definition.)

II. iPod shuffle Models

iPod shuffle (2nd generation) 1 GB

iPod shuffle (2nd generation) 2 GB

iPod shuffle (3rd generation) 4 GB

iPod shuffle (1st generation) 1 GB (Apple shipped thousands of the iPod shuffle (1st generation) 1 GB models during the Class Period even though the product was discontinued in September 2006 according to reseller transaction data. Those iPod shuffle (1st generation) 1 GB

models purchased between September 12, 2006 and March 31, 2009 are included in the Class Definition.)

iPod shuffle 512 MB (Apple shipped thousands of the iPod shuffle 512 MB models during the Class Period even though the product was discontinued in September 2006 according to reseller transaction data. Those iPod shuffle 512 MB models purchased between September 12, 2006 and March 31, 2009 are included in the Class Definition.)

III. iPod touch Models

iPod touch 8 GB

iPod touch 16 GB

iPod touch 32 GB

iPod touch (2nd generation) 8 GB

iPod touch (2nd generation) 16 GB

iPod touch (2nd generation) 32 GB

IV. iPod nano Models

iPod nano (2nd generation) 2 GB

iPod nano (2nd generation) 4 GB

iPod nano (2nd generation) 8 GB

iPod nano (3rd generation) 4 GB

iPod nano (3rd generation) 8 GB

iPod nano (4th generation) 4 GB (Apple retail sales only during the class period.)

iPod nano (4th generation) 8 GB

iPod nano (4th generation) 16 GB

iPod nano (1st generation) 1 GB (Apple shipped thousands of the iPod nano (1st generation) 1 GB models during the Class Period even though the product was discontinued in

September 2006 according to reseller transaction data. Those iPod nano (1st generation) 1 GB models purchased after September 12, 2006 are included in the Class Definition.)

iPod nano (1st generation) 2 GB (Apple shipped thousands of the iPod nano (1st generation) 2 GB models during the Class Period even though the product was discontinued in September 2006 according to reseller transaction data. Those iPod nano (1st generation) 2 GB models purchased after September 12, 2006 are included in the Class Definition.)

iPod nano (1st generation) 4GB (Apple shipped thousands of the iPod nano (1st generation) 4 GB models during the Class Period even though the product was discontinued in September 2006 according to reseller transaction data. Those iPod nano (1st generation) 4 GB models purchased after September 12, 2006 are included in the Class Definition.)

Sources:

Apple.com Identifying iPod models - <http://support.apple.com/kb/HT1353>; *see also* Apple_AIIA_B_000796 – 001493 (Apple Direct Purchase Resellers Confidential Price Lists for the relevant period); and Apple reseller transaction data, produced January 2011.

EXHIBIT B-D
[Filed Under Seal]