

1 Robert A. Mittelstaedt (State Bar No. 060359)  
 ramittelstaedt@jonesday.com  
 2 Craig E. Stewart (State Bar No. 129530)  
 cestewart@jonesday.com  
 3 David C. Kiernan (State Bar No. 215335)  
 dkiernan@jonesday.com  
 4 Amir Q. Amiri (State Bar No. 271224)  
 aamiri@jonesday.com  
 5 JONES DAY  
 6 555 California Street, 26th Floor  
 7 San Francisco, CA 94104  
 Telephone: (415) 626-3939  
 8 Facsimile: (415) 875-5700

9 Attorneys for Defendant  
 10 APPLE INC.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 OAKLAND DIVISION

14  
 15 **THE APPLE IPOD ITUNES ANTI-  
 16 TRUST LITIGATION**

Lead Case No. C-05-0037-YGR  
 [CLASS ACTION]

**DECLARATION OF AMIR AMIRI IN  
 SUPPORT OF PLAINTIFFS'  
 ADMINISTRATIVE MOTION TO  
 FILE UNDER SEAL**

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 24 1. I am an associate in the law firm of Jones Day, located at 555 California Street, 26<sup>th</sup> Floor,  
 25 San Francisco, CA 94104. I submit this declaration in support of Apple's Response to Plaintiffs'  
 26 Administrative Motion to File Under Seal portions of Plaintiffs' *Daubert* Motion to Exclude  
 27 Certain Opinion Testimony of Kevin M. Murphy and Robert H. Topel and Exhibits 1-10 to the  
 28 Sweeney Declaration in support thereof (ECF No. 737, "Administrative Motion"). The facts

Amiri Decl. in Support of Apple's Response to  
 Plaintiffs' Motion Seal  
 C-05-0037-YGR

1 stated in this declaration are true and based upon my own personal knowledge, and if called to  
2 testify to them, I would competently do so.

3 2. The relief requested in Plaintiffs' Administrative Motion is necessary and narrowly  
4 tailored to protect Apple's confidential business and pricing information. Plaintiffs' *Daubert*  
5 Motion, and the exhibits filed in support thereof, contain highly confidential information  
6 regarding iPod pricing strategy and information regarding sales of iPods to iPod resellers. As  
7 demonstrated in the attached declarations, each of which were previously submitted in connection  
8 with various other motions to seal similar data and documents during the pendency of this  
9 litigation, the disclosure of this information would harm Apple.

10 3. Attached as **Exhibit 1** is a true and correct copy of the Declaration of Mark Buckley in  
11 Support of Apple's Response to Plaintiffs' Under Seal Portions of Plaintiffs' Motion Regarding  
12 Schedule for Class Certification filed January 14, 2011, ECF No. 454.

13 4. Attached as **Exhibit 2** is a true and correct copy of the Declaration of Mark Buckley in  
14 Support of Apple's Response to Plaintiffs' Motion to File Under Seal Portions of Plaintiffs'  
15 Renewed Motion for Class Certification filed January 25, 2011, ECF No. 492.

16 Executed this 24th day of December, 2013 in San Francisco, California.

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18 /s/ Amir Q. Amiri  
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Amir Q. Amiri

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