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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

THE APPLE IPOD ITUNES ANTI-TRUST)
LITIGATION)

Lead Case No. C-05-00037-YGR

_____)

CLASS ACTION

This Document Relates To:)
ALL ACTIONS.)

[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE PLAINTIFFS'
MEMORANDUM OF LAW IN
OPPOSITION TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT AND TO
EXCLUDE EXPERT TESTIMONY OF
ROGER G. NOLL; PLAINTIFFS'
RESPONSIVE SEPARATE STATEMENT IN
SUPPORT OF OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT AND TO EXCLUDE EXPERT
TESTIMONY OF ROGER G. NOLL AND
EXHIBITS 1-4, 9-17, 20-29, 31-46, 48-54, 56,
AND 58-62 UNDER SEAL PURSUANT TO
CIVIL L.R. 7-11 AND 79-5(c)

1 Before the Court is Plaintiffs' Administrative Motion to File Under Seal Plaintiffs'
 2 Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment and to Exclude
 3 Expert Testimony of Roger G. Noll; Plaintiffs' Responsive Separate Statement in Support of
 4 Opposition to Defendant's Motion for Summary Judgment and to Exclude Expert Testimony of
 5 Roger G. Noll and Exhibits 1-4, 9-17, 20-29, 31-46, 48-54, 56, and 58-62 attached to Declaration of
 6 Bonny E. Sweeney in Support of Plaintiffs' Opposition to Defendants' Motion for Summary
 7 Judgment and to Exclude Expert Testimony of Roger G. Noll.

8 Specifically, plaintiffs seek leave to file under seal the following:

9 Exhibit 01:	Declaration of Roger G. Noll on Liability and Damages, dated April 3, 2013 [filed under seal] ;
10 Exhibit 02:	Rebuttal Declaration of Roger G. Noll on Liability and Damages, dated November 25, 2013 [filed under seal] ;
11 Exhibit 03:	Supplemental Rebuttal Declaration of Roger G. Noll on Liability and Damages, dated January 13, 2014 [filed under seal] ;
12 Exhibit 04:	Expert Report of David M. Martin Jr., Ph.D., dated April 8, 2013 [filed under seal] ;
13 Exhibit 09:	Deposition Transcript of Eddy Cue, taken December 17, 2010 [filed under seal] ;
14 Exhibit 10:	Deposition Transcript of Jeffrey L. Robbin, taken December 3, 2010 [filed under seal] ;
15 Exhibit 11:	Deposition Transcript of Augustin J. Farrugia, taken December 8, 2010 [filed under seal] ;
16 Exhibit 12:	Declaration of Augustin Farrugia in Support of Defendant's Renewed Motion for Summary Judgment, dated January 2011 [filed under seal] ;
17 Exhibit 13:	Apple AIIA00098417 [filed under seal] ;
18 Exhibit 14:	Deposition Transcript of David K. Heller, taken December 15, 2010 [filed under seal] ;
19 Exhibit 15:	Apple AIIA01278671-74 [filed under seal] ;
20 Exhibit 16:	Apple AIIA01202393-401 [filed under seal] ;
21 Exhibit 17:	Apple AIIA00099408-09 [filed under seal] ;
22 Exhibit 19:	Declaration of Lee Morse, dated January 19, 2007;
23 Exhibit 20:	Apple AIIA01278810-11 [filed under seal] ;
24 Exhibit 21:	Apple AIIA01385106 [filed under seal] ;
25 Exhibit 22:	Deposition Transcript of Steve Jobs, taken April 12, 2011 [filed under seal] ;
26 Exhibit 23:	Apple AIIA00090441-43 (Cue Depo. Ex. 64) [filed under seal] ;
27 Exhibit 24:	Apple_AIIA_00979727 [filed under seal] ;
28 Exhibit 25:	Apple_AIIA00327951-52 (Cue Deposition Exhibit 71) [filed under seal] ;
Exhibit 26:	Apple AIIA00091049-51 [filed under seal] ;
Exhibit 27:	Apple AIIA00090447-49 [filed under seal] ;
Exhibit 28:	Apple AIIA00090471 [filed under seal] ;
Exhibit 29:	Apple AIIA00090467-68 [filed under seal] ;

1	Exhibit 31:	Apple AIIA00090405-07 [filed under seal] :
	Exhibit 32:	Apple AIIA00090429-31 [filed under seal] :
2	Exhibit 33:	Rebuttal Expert Report of David M. Martin Jr., Ph.D., dated October 30, 2013 [filed under seal] :
3	Exhibit 34:	Apple AIIA00090485-88 [filed under seal] :
4	Exhibit 35:	Compendium of Customer Complaints Containing: Apple_AIIA0000674-77; Apple_AIIA0002406; 5 Apple_AIIA00062113-15; Apple_AIIA00057320-38; 6 Apple_AIIA00006477-82; Apple_AIIA00007040-45; 7 Apple_AIIA00007064-69; Apple_AIIA00007549-56; 8 Apple_AIIA00007575-86; Apple_AIIA00008481-86; 9 Apple_AIIA00008499-504; Apple_AIIA00067464-68; 10 Apple_AIIA00067479-83; Apple_AIIA00067605-11; 11 Apple_AIIA00067632-36; Apple_AIIA00067979-83; 12 Apple_AIIA00069598-604; Apple_AIIA00059009-14 and 13 Apple_AIIA00059088-93 [filed under seal] :
	Exhibit 36:	Apple AIIA00093875-76 [filed under seal] :
	Exhibit 37:	Apple_AIIA00090427 [filed under seal] :
	Exhibit 38:	Apple AIIA00090428 [filed under seal] :
	Exhibit 39:	Apple AIIA00329373 [filed under seal] :
	Exhibit 40:	Apple AIIA00093265 [filed under seal] :
	Exhibit 41:	Apple AIIA00090482-83 [filed under seal] :
	Exhibit 42:	Apple AIIA00094563-69 [filed under seal] :
	Exhibit 43:	Apple AIIA00802966-67 [filed under seal] :
	Exhibit 44:	Apple AIIA00807080-81 [filed under seal] :
	Exhibit 45:	Apple AIIA00320482-84 (Cue Depo. Ex. 58) [filed under seal] :
	Exhibit 46:	Apple AIIA00093504 [filed under seal] :
	Exhibit 48:	Deposition Transcript of Mark Donnelly, taken December 20, 2010 [filed under seal] :
	Exhibit 49:	Apple AIIA00187793-823 [filed under seal] :
	Exhibit 50:	Deposition Transcript of Roger G. Noll, taken December 18, 2013 [filed under seal] :
	Exhibit 51:	Deposition Transcript of Roger G. Noll, taken May 16, 2013 [filed under seal] :
	Exhibit 52:	Deposition Transcript of Robert H. Topel, taken January 8, 2014 [filed under seal] :
	Exhibit 53:	Deposition Transcript of Kevin M. Murphy, taken January 8, 2014 [filed under seal] :
	Exhibit 54:	Declaration of Jeffrey M. Wooldridge in Support of Plaintiff's Daubert Motion to Exclude Certain Opinion Testimony of Robert H. Topel and Kevin M. Murphy, dated December 20, 2013 [filed under seal] :
	Exhibit 56:	Apple AIIA00093859 [filed under seal] :
	Exhibit 58:	Deposition Transcript of Melanie Tucker, taken October 26, 2007 [filed under seal] :
	Exhibit 59:	Supplemental Declaration of Augustin Farrugia, dated July 2, 2013 [filed under seal] :
	Exhibit 60:	Deposition Transcript of Somtai Charoensak, taken January 12, 2007 [filed under seal] :
	Exhibit 61:	Apple AIIA00325894-97 [filed under seal] ; and
27	Exhibit 62:	Deposition Transcript of Roger G. Noll, taken April 7, 2011 [filed under seal] .
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1 There being good cause shown based on the arguments presented in the motion, the pleadings
2 on file, and any other relevant matter, the Court **GRANTS** Plaintiffs' Administrative Motion to File
3 Under Seal.

4 IT IS SO ORDERED.

5 DATED: _____

THE HON. YVONNE GONZALES ROGERS
UNITED STATES DISTRICT JUDGE

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