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5 Attorneys for Defendant
 APPLE, INC., a California corporation

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 JONATHAN LALO, Individually and On
 12 Behalf of a Class of Similarly Situated
 Individuals.

13 Plaintiff,

14 v.

15 APPLE INC., a California Corporation;
 16 BACKFLIP, a Delaware Corporation;
 DICTONARY.COM, a California
 17 Corporation; PANDORA, INC., a
 California Corporation; THE WEATHER
 18 CHANNEL, a Georgia Corporation,

19 Defendants.

Case No. CV 10-5878 LHK

**ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER CASES SHOULD
 BE RELATED**

Honorable Lucy H. Koh

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 21 Pursuant to Local Rule 3-12, Defendant Apple, Inc., a California corporation (“Apple”)
 22 submits this Administrative Motion to Consider Whether Cases Should Be Related to give notice
 23 of the following related action:

- 24 • *Dustin Freeman, et al., on Behalf of Themselves and Others Similarly Situated, Plaintiffs,*
 25 *v. Apple, Inc., a Delaware Corporation, et al., Defendants, Case No. CV 10-5881 HRL,*
 filed December 23, 2010.¹

26 The two actions are related because they arise from the same or substantially identical

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 28 ¹ A copy of the *Freeman* Complaint is attached as Exhibit A

1 transactions, happenings or events, and call for determination of the same or substantially
2 identical questions and fact, and related questions of law. In particular, both actions involve
3 allegations that certain applications that can be downloaded by users to work on iPhone or iPad
4 devices capture and abuse personal identifying information of iPhone and iPad users by
5 transmitting information from the Unique Device Identification (“UDID”) associated with each
6 device. Although the group of defendants in the two actions differs somewhat, Apple is a
7 defendant in both actions, and the other named defendants are all developers of various iPhone
8 and iPad applications. The alleged capture and abuse of user information from the devices’
9 UDID’s is alleged in both actions to constitute violations of various statutes and common law
10 principles concerning personal privacy and consumer protection.

11 For the foregoing reasons, assignment of the two actions to a single district court judge is
12 likely to effect a saving of judicial effort and other economies, and it will diminish the likelihood
13 of inconsistent results.

14 Dated: January 28, 2011

HOGAN LOVELLS US LLP

By: /s/ Michael L. Charlson

Michael L. Charlson

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APPLE, INC., a California corporation

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28