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7	Attorneys for Defendant Apple Inc.	
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9	UNITED STATE	S DISTRICT COURT
10	NORTHERN DISTI	RICT OF CALIFORNIA
11	SAN JOS	SE DIVISION
12		
13	IN RE HIGH-TECH EMPLOYEE ANTITRUST LITIGATION	Master Docket No. 11-CV-2509 LHK
14	THIS DOCUMENT RELATES TO:	OMNIBUS DECLARATION OF CHRISTINA J. BROWN IN SUPPORT
15	ALL ACTIONS	OF DEFENDANTS' REPLIES IN SUPPORT OF JOINT MOTION TO
16		EXCLUDE TESTIMONY OF EDWARD E. LEAMER, PH.D. AND JOINT
17		MOTION TO STRIKE IMPROPER REBUTTAL TESTIMONY IN DR.
18		LEAMER'S REPLY EXPERT REPORT
19		Date: March 20, 2014 and March 27, 2014
20		Time: 1:30 p.m. Courtroom: 8, 4th Floor
21		Judge: The Honorable Lucy H. Koh
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28		OMNIBUS BROWN DECL. ISO REPLIES ISO
		MOTIONS TO EXCLUDE AND STRIKE NO. 11-CV-2509-LHK
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1	I, Christina J. Brown, declare as follows:	
2	1. I am a member of the Bar of the State of California and a counsel at O'Melveny &	
3	Myers LLP, attorneys for Defendant Apple Inc. I submit this declaration in support of	
4	Defendants' Replies in Support of Joint Motion to Exclude the Expert Testimony of Edward E.	
5	Leamer, Ph.D. and Joint Motion to Strike the Improper Rebuttal Testimony in Dr. Leamer's	
6	Reply Expert Report or, in the Alternative, for Leave to Submit a Reply Report of Dr. Stiroh.	
7	I make this declaration based on my own personal knowledge. If called to testify as a witness,	
8	I could and would do so competently.	
9	2. Attached hereto as Exhibit A is a true and correct copy of the November 12, 2012	
10	Expert Report of Professor Kevin M. Murphy.	
11	3. Attached hereto as Exhibit B is a true and correct copy of excepts from the	
12	October 26, 2012, November 18, 2013, and December 19, 2013 deposition testimony of Dr.	
13	Edward Leamer.	
14	4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the	
15	December 3, 2012 deposition testimony of Dr. Kevin Murphy.	
16	5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the	
17	December 9, 2013 deposition testimony of Dr. Lauren Stiroh.	
18	6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the	
19	January 29, 2013 deposition testimony of Paul Otellini.	
20	7. Attached hereto as Exhibit F is a true and correct copy of a document produced by	
21	Google bearing Bates number GOOG-HIGH-TECH-00058864.	
22	8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the	
23	Federal Judicial Center, Reference Manual on Scientific Evidence (3d ed. 2011).	
24	9. Attached hereto as Exhibit H is a true and correct copy of excerpts from	
25	Understanding and Using Advanced Statistics (2006).	
26	10. Attached hereto as Exhibit I is a true and correct copy from the STATA Manual -	
27	Stata 13 help for regress. The document was printed from http://www.stata.com/help.cgi?regress.	

which was last visited on February 27, 2014.

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1	11. Attached hereto as Exhibit J is a true and correct copy of excerpts from <i>Statistics</i>	
2	in a Nutshell (1st ed. 2008).	
3	12. Attached hereto as Exhibit K is a true and correct copy of excerpts from A Guide	
4	to Modern Econometrics (2d ed. 2004).	
5	13. Attached hereto as Exhibit L is a true and correct copy of excerpts from A Course	
6	in Econometrics (1991).	
7	14. Attached hereto as Exhibit M is a true and correct copy of excerpts from <i>Proving</i>	
8	Antitrust Damages, Legal and Economic Issues (2d ed. 2010).	
9	15. Attached hereto as Exhibit N is a true and correct copy of excerpts from <i>Principle</i>	
10	of Econometrics (4th ed. 2011).	
11	16. Attached hereto as Exhibit O is a true and correct copy of excerpts from	
12	Microeconometrics, Methods and Applications (2005).	
13	17. Attached hereto as Exhibit P is a true and correct copy of Multicountry,	
14	Multifactor Tests of the Factor Abundance Theory, <i>The American Economic Review</i> (Dec. 1987)	
15	18. Attached hereto as Exhibit Q is a true and correct copy of Sets of Posterior Means	
16	with Bounded Variance Priors, Econometrica (May 1982).	
17		
18	I declare under penalty of perjury under the laws of the United States that the above is tru	
19	and correct. Executed on February 27, 2014, in San Francisco, California.	
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21	/s/ Christina J. Brown Christina J. Brown	
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