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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN JOSE DIVISION

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13 IN RE HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509 LHK

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THIS DOCUMENT RELATES TO:

**OMNIBUS DECLARATION OF
CHRISTINA J. BROWN IN SUPPORT
OF DEFENDANTS' REPLIES IN
SUPPORT OF JOINT MOTION TO
EXCLUDE TESTIMONY OF EDWARD
E. LEAMER, PH.D. AND JOINT
MOTION TO STRIKE IMPROPER
REBUTTAL TESTIMONY IN DR.
LEAMER'S REPLY EXPERT REPORT**

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ALL ACTIONS

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Date: March 20, 2014 and
March 27, 2014

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Time: 1:30 p.m.

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Courtroom: 8, 4th Floor

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Judge: The Honorable Lucy H. Koh

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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 excerpts 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>,
28 which was last visited on February 27, 2014.

