

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: APPLE IPHONE 3G AND 3G-S "MMS"
MARKETING AND SALES PRACTICES
LITIGATION

MDL DOCKET NO. 2116

SECTION: J

THIS DOCUMENT RELATES TO ALL CASES

JUDGE BARBIER
MAG. JUDGE WILKINSON

**MOTION FOR LEAVE TO FILE PLAINTIFFS'
RESPONSE TO DEFENDANTS' OBJECTIONS TO EXEMPLAR COMPLAINT**

NOW INTO COURT, by and through Plaintiffs' Liaison Counsel, comes Putative Class Plaintiffs, who respectfully moves this Honorable Court for an order granting leave to file a Response to Defendants' Objections to Exemplar Complaint. The Plaintiffs' Steering Committee believes that the Court will be well served by reviewing the attached response in advance of the May 13, 2010 status conference. The attached response lays out Putative Class Plaintiffs' ideas on how the litigation should proceed.

WHEREFORE, Putative Class Plaintiffs respectfully move that this motion be granted and that the attached order granting leave be signed, allowing leave to file a Response to Defendants' Objections to Exemplar Complaint.

RESPECTFULLY SUBMITTED:

MARTZELL & BICKFORD

/s/ Scott R. Bickford
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Plaintiffs Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all counsel of record by via ECF this 5th day of May, 2010.

/s/ Scott R. Bickford