

December 30, 2009

Judge Carl J. Barbier  
United States Court for the  
Eastern District of Louisiana  
Section "J"  
500 Poydras Street, Room C256  
New Orleans, LA 70130

RE: MDL 2116 - APPLE iPHONE 3G AND 3GS "MMS" :  
MARKETING AND SALES PRACTICES

Dear Judge Barbier,

We, the undersigned, believe we represent all of the Putative Class Plaintiffs in all cases currently pending in MDL 2116. Pursuant to Pre-Trial Order #1, we propose Scott R. Bickford of Martzell & Bickford in New Orleans, Louisiana as liaison counsel. The proposal of Mr. Bickford as liaison counsel is based on his class action/complex litigation experience and based on his office's proximity to the Courthouse.

Should the Court accept the proposal of Mr. Bickford as liaison counsel, Mr. Bickford has expressed his willingness to accept. We have attached a summary of Mr. Bickford's experience for the Court's consideration.

Additionally, we would ask that this letter be made part of the record of MDL 2116.

Respectfully submitted,

/s/ Ronnie G. Penton  
RONNIE G. PENTON (LA #10462)  
PENTON LAW FIRM  
209 Hoppen Place  
Bogalusa, LA 70427  
Telephone: (985) 732-5651  
Facsimile: (985) 735-5579  
Email: [fedcourtmail@rgplaw.com](mailto:fedcourtmail@rgplaw.com)  
Counsel for Plaintiffs in "Carbine, et al v. Apple,  
Inc, et al.", (Eastern District of Louisiana)

/s/ John R. Climaco

John R. Climaco (OH #0011456)  
Patrick G. Warner (OH #0064604)  
CLIMACO, LEFKOWITZ, PECA, WILCOX &  
GAROFOLI CO. LPA  
55 Public Square  
Suite 1950  
Cleveland, OH 44113  
Telephone: (216) 621-8484  
Facsimile: (216) 771-1632  
Email: [jrclim@climacolaw.com](mailto:jrclim@climacolaw.com)  
Email: [pgwarn@climacolaw.com](mailto:pgwarn@climacolaw.com)  
Counsel for Plaintiffs in Sullivan et al v. Apple, Inc,  
et al., (Northern District of Ohio)

/s/ Daniel E. Becnel, Jr.

Daniel E. Becnel, Jr., LA Bar # 2926  
Matthew B. Moreland, LA Bar # 24567  
Becnel Law Firm, LLC  
P.O. Drawer H  
Reserve, LA 70084  
985-536-1186  
985-536-6445 (Facsimile)  
[dbecnel@becnellaw.com](mailto:dbecnel@becnellaw.com)  
[mmoreland@becnellaw.com](mailto:mmoreland@becnellaw.com)  
Counsel for Plaintiff FrancisMonticelli,  
individually and on behalf of all others  
similarly situated

s/ David M. Cialkowski

David M. Cialkowski  
(MN Bar No. 306526)  
ZIMMERMAN REED, P.L.L.P.  
651 Nicollet Mall, Suite 501  
Minneapolis, MN 55402  
Telephone: (612) 341-0400  
Facsimile: (612) 341-0844  
[David.cialkowski@zimmreed.com](mailto:David.cialkowski@zimmreed.com)  
Counsel for Plaintiffs in Irving, et al v. Apple, Inc,  
et al., (District Court of Minnesota)

/s/Daniel L. Germain

Daniel L. Germain (CA# 143334)

Rosman & Germain LLP

16311 Ventura Boulevard

Suite 1200

Encino, CA 91436-2152

Telephone: (818) 788-0877

Facsimile: (818) 788-0885

[Germain@lalawyer.com](mailto:Germain@lalawyer.com)

Counsel for Plaintiffs in Williams et al v. Apple,  
Inc, et al., (Central District of  
California)

/s/ Mark Geragos

MARK GERAGOS

mark@geragos.com

SHELLEY KAUFMAN

kaufman@geragos.com

TAMAR ARMINAK

[arminak@geragos.com](mailto:arminak@geragos.com)

GERAGOS & GERAGOS

644 S. Figueroa Street

Los Angeles, CA 90017

Telephone: (213) 625-3900

Facsimile: (213) 625-1600

Counsel for Plaintiffs in Kamarian et al v. Apple,  
Inc, et al., (Central District of California)

/s/ Joel J.Schwartz

Joel J. Swartz #18652

Rosenblum, Schwartz, Rogers, Glass, P.C.

120 South Central Avenue

Suite 130

Clayton, Missouri 63105

120 S. Central, Suite 130

St. Louis, MO 63105

Telephone: (314) 862-4332

Facsimile: (314) 862-8050

E-Mail: [jschwartz@rsrglaw.com](mailto:jschwartz@rsrglaw.com)

/s/ Timothy A. Engelmeyer,  
Timothy A. Engelmeyer, #39941  
[tim@epfirm.com](mailto:tim@epfirm.com)  
Anthony M. Pezzani, #52900  
[tony@epfirm.com](mailto:tony@epfirm.com)  
ENGELMEYER & PEZZANI, LLC  
13321 N. Outer Forty Road, Suite 300  
Chesterfield, MO 63017  
Telephone: 636-532-9933  
Facsimile: 314-863-7793  
Counsel for Plaintiffs in Meeker, et al v. Apple, Inc,  
et al., (Southern District of Illinois)  
Counsel for Plaintiffs in Goette, et al v. Apple, Inc,  
et al., (Eastern District of Missouri)

/s/ Frank E. Piscitelli, Jr.  
Frank E. Piscitelli, Jr. (OH #0062128)  
55 Public Square, Suite 1950  
Cleveland, OH 44113  
Telephone: (216) 931-7000  
Facsimile: (216) 931-9925  
Email: [frank@feplaw.com](mailto:frank@feplaw.com)  
Counsel for Plaintiffs in Pietrangelo, et al v. Apple,  
Inc, et al., (Northern District of Ohio)

/s/ D. Scott Kalish  
D. Scott Kalish (OH #0063002)  
SCOTT KALISH CO LLC  
405 Western Reserve Bldg.  
1468 West Ninth Street  
Cleveland, Ohio 44113  
Email: [scottkalishcollc@cs.com](mailto:scottkalishcollc@cs.com)  
Counsel for Plaintiffs in Carr, et al v. Apple, Inc, et  
al., (Northern District of Ohio)

/s/ Brian R. Strange

Brian R. Strange  
STRANGE & CARPENTER  
12100 Wilshire Blvd., Suite 1900  
Los Angeles, CA 90025  
Telephone: (310) 207-5055  
Facsimile: (310) 826-3210  
E-mail: [lacounsel@earthlink.net](mailto:lacounsel@earthlink.net)  
Counsel for Plaintiff Philip Sterker

/s/ Brian J. Robbins

Brian J. Robbins -  
ROBBINS UMEDA LLP  
600 B Street, Suite 1900,  
San Diego, CA 92101  
Telephone: (619)525-3990  
Facsimile: (619) 525-3991  
E-mail: [notice@robbinsumeda.com](mailto:notice@robbinsumeda.com)  
Counsel for Plaintiff Arturo Molina

/s/ Timothy Blood

Timothy Blood  
COUGHLIN STOIA GELLER  
RU-DMAN & ROBBINS LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 231-1058  
Facsimile: (619) 231-7423  
E-mail: [timb@csgrr.com](mailto:timb@csgrr.com)  
Counsel for Plaintiff Arturo Molina