

# EXHIBIT C

**BEFORE THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

In re:

Apple iPhone 3G Products Litigation

MDL Docket No.

**SEPARATE STATEMENT OF REASONS WHY ORAL ARGUMENT SHOULD  
BE HEARD IN SUPPORT OF MOTION FOR TRANSFER AND  
CONSOLIDATION OF RELATED APPLE IPHONE 3G PRODUCTS  
LITIGATION PURSUANT TO 28 U.S.C. § 1407**

PENELOPE A. PREVOLOS  
ANDREW D. MUHLBACH  
HEATHER A. MOSER  
MORRISON & FOERSTER<sup>LLP</sup>  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: (415) 268-7000

JAMIE A. LEVITT  
MORRISON & FOERSTER<sup>LLP</sup>  
1290 Avenue of the Americas  
New York, New York 10104-0185  
Telephone: (212) 468-8000

DON G. RUSHING  
MORRISON & FOERSTER<sup>LLP</sup>  
12531 High Bluff Drive, Suite 100  
San Diego, California 92130-2040  
Telephone: (858) 720-5100

JEFFREY J. GREENBAUM  
SILLS CUMMIS & GROSS P.C.  
One Riverfront Plaza  
Newark, New Jersey 07102  
Telephone: (973) 643-7000

JANET T. MUNN  
FELDMAN GALE, P.A.  
One Biscayne Tower, 30th Floor  
2 South Biscayne Boulevard  
Miami, FL 33131-4332  
Telephone: (305) 397-0798

*Attorneys for Defendant APPLE INC.*

Pursuant to Rule 16.1(b) of the Rules of Procedure for the Judicial Panel on Multidistrict Litigation (the "Panel"), defendant Apple Inc. ("Apple") submits this Separate Statement of Reasons Why Oral Argument Should Be Heard in further support of its concurrently filed Motion for Transfer and Consolidation pursuant to 28 U.S.C. section 1407.

There are numerous reasons why oral argument should be heard on Apple's pending motion to transfer. Oral argument is necessary to address any possible opposition raised regarding whether the objectives of the transfer statute are sufficiently served to justify transfer. Moreover, the parties will be able to respond to any inquiries the Panel might have about the specific advantages posed by transfer to the Northern District of California. Finally, oral argument would serve the purposes of efficiency and judicial economy. There are twelve separate actions pending in five different federal district courts. The parties are collectively represented by nineteen (19) law firms. Having counsel present before the Panel to respond to any questions the Panel may have that were not addressed by the parties' briefs would ensure that the Panel has complete information regarding the facts and the parties' positions as to the propriety of transfer or the propriety of the proposed transferee district.

For the foregoing reasons, Apple respectfully requests that the Panel grant oral argument on its motion for an order transferring and consolidating the related Apple iPhone 3G Products Litigation to the Northern District of California.

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Respectfully submitted,

PENELOPE A. PREVOLOS  
ANDREW D. MUHLBACH  
HEATHER A. MOSER  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105  
Telephone: (415) 268-7000  
Facsimile: (415) 268-7522

JAMIE LEVITT  
MORRISON & FOERSTER LLP  
1290 Avenue of the Americas  
New York, New York 10104-0185  
Telephone: (212) 468-8000

DON G. RUSHING  
MORRISON & FOERSTER LLP  
12531 High Bluff Drive, Suite 100  
San Diego, California 92130-2040  
Telephone: (858) 720-5100

JEFFREY J. GREENBAUM  
SILLS CUMMIS & GROSS P.C.  
One Riverfront Plaza  
Newark, NJ 07102  
Telephone: (973) 643-7000

JANET T. MUNN  
FELDMAN GALE, P.A.  
One Biscayne Tower, 30th Floor  
2 South Biscayne Boulevard  
Miami, FL 33131-4332  
Telephone: (305) 397-0798

By:   
Penelope A. Prevolos

Attorneys for Defendant  
APPLE INC.