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MEMO ENDORSE

February 1, 2013

BY HAND

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, New York 10007

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DENISE COTE

J.T. Colby & Co. et al. v. Apple Inc.,
No. 11-cv-4060 (DLC) (S.D.N.Y.)

Dear Judge Cote:

We are co-counsel to Plaintiffs in the above-referenced action. Pursuant to the Court's January 23, 2013, Order concerning redactions, we enclose herein targeted proposed redactions to Exhibit 52 of the Declaration of Bonnie Jarrett, to the transcripts of the July 18, 2012 Rule 30(b)(6) deposition of John T. Colby and the December 4, 2012 deposition of Mike Shatzkin, and to the September 17 and October 26, 2012 reports of Defendant's proposed expert Gregory S. Carpenter and the exhibits thereto.

As required by Section 4(A)(1) of Your Honor's Individual Practices, we have enclosed with this letter a binder containing copies of the documents and exhibits wherein redactions are sought, with the words, phrases, or paragraphs to be redacted highlighted. Additionally, as required by Section 4(A)(2) of Your Honor's Individual Practices, we have also enclosed looseleaf sets of solely the pages on which redactions have been requested by placing those unredacted pages in clear sheet protectors immediately following each complete, redacted portion.

We thank the Court for its consideration of this matter.

*Redactions are approved -
Yvonne Cole
2/5/13*



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February 1, 2013
Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David A. Shaiman', written in a cursive style.

David A. Shaiman

Enclosures

cc: All counsel of record (by email, without enclosures)
Dale M. Cendali, Esq. (by hand, with enclosures)