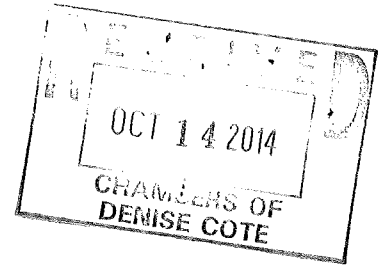


**The
Bromwich
Group**

DOCUMENT
ELECTRONICALLY

10/15/2014

The Bromwich Group LLC
901 New York Avenue, NW, 5th Floor
Washington, DC 20001

October 14, 2014

BY HAND DELIVERY AND EMAIL

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States of America v. Apple, Inc., et al., 12 Civ. 2826
State of Texas, et al., v. Penguin Group (USA) Inc., et al., 12 Civ. 3394

Dear Judge Cote:

Pursuant to Section VI.C of the September 5, 2013 Final Judgment and Order Entering Permanent Injunction in the above-captioned matter, and pursuant to the April 14, 2014 Endorsed Letter, I am electronically transmitting and hand-delivering two copies of our second report. The first copy, labeled "Non-Confidential Version," contains redactions for information Apple has designated as confidential and proprietary. The second copy, labeled "Confidential Version," which is being filed under seal, contains text and exhibits that are redacted in the "Non-Confidential Version."

Regarding the information and exhibits it wishes to keep confidential, Apple has represented to us the following:

"The information proposed to be redacted is Apple's highly sensitive and confidential business information, the disclosure of which risks considerable harm to Apple. The exhibits are Apple's proprietary materials developed

Letter to Honorable Denise L. Cote
October 14, 2014
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through significant time, resources, and cost to Apple and therefore should remain confidential also."

The Parties in this matter are copied on this letter. Plaintiffs are receiving the "Non-Confidential Version" of the report electronically today. Apple is receiving both the "Non-Confidential Version" and "Confidential Version" copies electronically today.

Respectfully submitted,



Michael R. Bromwich

cc: Matthew J. Reilly, Esq.
Mark W. Ryan, Esq.
Eric Lipman, Esq.

Apple shall by October 17 consent to providing the redacted material, including exhibits, to the plaintiffs as explain in a letter to the Court, not filed on ECF, why such disclosure should not be made.

*Denise Cote
Oct. 15, 2014*