

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA)

Plaintiff)

v.)

APPLE, INC.,)
HACHETTE BOOK GROUP, INC.,)
HARPERCOLLINS PUBLISHERS L.L.C.,)
VERLAGSGRUPPE GEORG VON)
HOLTZBRINCK GMBH,)
HOLTZBRINCK PUBLISHERS, LLC)
d/b/a MACMILLAN,)
THE PENGUIN GROUP,)
A DIVISION OF PEARSON PLC,)
PENGUIN GROUP (USA), INC.,)
and SIMON & SCHUSTER, INC.,)

Civil Action No. 12-cv-2826

Defendants.)
_____)

CORPORATE DISCLOSURE STATEMENT
OF THE PENGUIN GROUP, A DIVISION OF PEARSON PLC
AND PENGUIN GROUP (USA), INC.

Pursuant to Fed. R. Civ. P. R. 7.1, the undersigned counsel for Defendants The Penguin Group, A Division of Pearson plc, and Penguin Group (USA), Inc., hereby states that Pearson plc, a publicly held company, is the ultimate parent corporation of Penguin Group (USA), Inc. Penguin Group (USA) Inc. is a wholly owned subsidiary of Pearson Longman, Inc. Pearson Longman, Inc. is a wholly-owned subsidiary of Pearson, Inc. Pearson, Inc. is owned by Pearson Capital Company LLC (5.59%) and Pearson Luxembourg Holdings Ltd. (94.24%) and their parent, Pearson Overseas Holdings, Ltd. (0.17 %). Pearson Overseas Holdings, Ltd. is a wholly owned subsidiary of Pearson plc. Pearson plc shares are publicly traded on the London Stock Exchange, and Pearson plc ADRs trade on the NY Stock Exchange. No other publicly held company owns 10% or more of either The Penguin Group, A Division of Pearson plc, or Penguin Group (USA), Inc.'s stock.

DATED: May 29, 2012

By: /s/ Daniel F. McInnis

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of Pearson plc, and Penguin Group (USA),
Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 29, 2012, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

DATED: May 29, 2012

/s/
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