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WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLC
55 WEST MONROE STREET, SUITE 1111
CHICAGO, IL 60603

June 12, 2009

VIA EMAIL

Re: Apple & ATTM Antitrust Litigation – Electronic Documents

Dear Class Representative,

In accordance with the Federal Rules of Civil Procedure and the document requests made by Apple and AT&T Mobility in this case, you are obligated to produce certain documents that you may have on your personal computers, laptops, iPhones or other cell phones and personal digital assistants (PDAs).

As we discussed, please follow the instructions below. If you have any questions, do not hesitate to contact me by phone at 212-545-4738 or by email at biesanz@whafh.com.

INSTRUCTIONS

Before you begin, take some time to read over Appendix A and become familiar with those categories of documents. You must search every webmail account you have, and every computer-like device you have.

1. Webmail accounts

Search each web-based email account for each of the search terms in Appendix B. For each email you find that fits one of the categories in Appendix A, please print a copy, including any and all attachments. When you have searched for all the search terms, and printed all the applicable emails, please mail the printed copies to me at:

Wolf Haldenstein Adler Freeman & Herz
Attn: Zach Biesanz
270 Madison Ave.
New York, NY 10016

2. Personal computers, Cell phones and PDAs

For each e-mail capable cell phone, PDA and computer you have, search all documents on the computer for the search terms in Appendix B. If any of the documents that you find fit any of the categories in Appendix A, please let me know. If you find a single document with one of the Appendix B keywords that fits one of the Appendix A categories, this part of the search is complete and you need not take any action beyond notifying me. If you search for each of the keywords and find no documents that fit the Appendix A categories, please let me know that you found no documents on your computers.

Please call me if you have any questions about these instructions.

Dated: June 12, 2009

Very truly yours,



Zach Biesanz

APPENDIX A – CATEGORIES OF DOCUMENTS

1. Documents mentioning, describing, or referring to the iPhone.
2. Documents relating to your decision to purchase the iPhone, including:
 - a. Research you conducted;
 - b. Communications with Apple or ATTM or other wireless service providers
 - c. Communications with friends, family, etc.
3. Documents relating to the exclusivity agreement between Apple and ATTM.
4. Documents relating to your purchase of the iPhone, ownership of the iPhone, or signing up with ATTM.
5. Documents relating to your use of the iPhone, including voice and data services.
6. Documents relating to Apple's policies regarding third-party applications (iPhone applications not approved by Apple).
 - a. Research you conducted;
 - b. Communications with Apple or ATTM or other wireless service providers
 - c. Communications with friends, family, etc.
7. Documents relating to your purchase or use of third-party applications.
8. Documents relating to your purchase and/or use of third party applications on any other cell phone you have owned.
9. Documents relating to locking or unlocking your iPhone, including:
 - a. Research you conducted;
 - b. Communications with Apple or ATTM or other wireless service providers
 - c. Communications with friends, family, etc.
10. Documents relating to modification or alteration of your iPhone.

11. Documents relating to Version 1.1.1 of the iPhone operating software.
12. Documents relating to iPhone warranties or your knowledge or understanding of those warranties, including:
 - a. Research you conducted;
 - b. Communications with Apple or ATTM or other wireless service providers
 - c. Communications with friends, family, etc.
13. Documents related to the purchase of any third party warranty for your iPhone.
14. Documents relating to your efforts to get your iPhone serviced, repaired, or replaced.
15. Documents related to the bricking of your iPhone, if applicable, including:
 - a. Documents concerning the purchase of a replacement for any bricked iPhone
 - b. Any notice provided by Apple or ATTM about bricking
 - c. Apple and ATTM's response to bricking
16. Documents related to any allowances, discounts, rebates or other promotions, reimbursements or credits that you received from any source whatsoever in connection with your purchase of the iPhone and/or voice and data services for the iPhone.

APPENDIX B – KEY WORD LIST

- iPhone
- Apple Phone
- AT&T
- AH
- AT&TM
- ATTM
- Cingular
- brick
- bricking
- bricked
- third party applications
- third party apps
- 3rd party applications
- 3rd party apps
- GSM
- CDMA
- 2G
- EDGE
- HSDPA
- EV-DO
- EVDO
- UMTS
- 1.1.1
- Verizon
- T-Mobile
- Sprint
- Alitel
- U.S. Cellular
- Cricket
- Metro PCS
- Midwest Wireless
- Qualcomm
- MVNO
- Roaming
- Roaming charges
- Qualified revenue
- Qualified Family Talk revenue
- Lock
- Unlock
- SIM
- profit share

- profit sharing
- revenue share
- revenue sharing
- warranty
- warranties

- FUD
- fear, uncertainty and doubt
- fear uncertainty and doubt
- SDK
- software developer kit
- jailbreak
- jailbroke
- jail break
- jail broke
- dev-team
- baseband
- voice plan
- data plan
- voice and data
- unlimited data
- cat and mouse
- cat-and-mouse
- Holman (not applicable to Plaintiff Holman's documents)
- Rivello (not applicable to Plaintiff Rivello's documents)
- Timothy Smith (not applicable to Plaintiff Smith's documents)
- Kliegerman (not applicable to Plaintiff Kliegerman's documents)
- Michael Lee (not applicable to Plaintiff Lee's documents)
- Macasaddu (not applicable to Plaintiff Macasaddu's documents)
- Morikawa (not applicable to Plaintiff Morikawa's documents)
- Scotti (not applicable to Plaintiff Scotti's documents)
- Sesso (not applicable to Plaintiff Sesso's documents)
- ACME
- Jobs
- Cue
- Cooper
- Locking
- Unlocking
- Termination
- Apple & Exclusive
- 3' party applications
- Apps
- Revenue & share
- Profit & share
- Subsidy

- 2-year
- 2year
- two year
- Two-year
- 5-year

- 5 year
- Five-year
- Five year
- Multi-year
- Multi year
- \$175
- 20 launch
- 20-launch
- Software update
- ETF