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16 Interim Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN JOSE DIVISION**

19 IN RE APPLE IPHONE 4 PRODUCTS  
LIABILITY LITIGATION

MDL Docket No. 10-2188 (RMW)

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21 THIS DOCUMENT RELATES TO:

22 All Actions

23 NOTICE OF UNOPPOSED MOTION AND  
24 MOTION FOR PRELIMINARY APPROVAL OF  
25 CLASS ACTION SETTLEMENT,  
26 CERTIFICATION OF THE SETTLEMENT  
27 CLASS, SETTING A HEARING ON FINAL  
28 APPROVAL OF SETTLEMENT, AND  
DIRECTING NOTICE TO THE CLASS

DATE: February 17, 2012  
TIME: 2:00 P.M.  
CTRM: 6, 4th Floor

Judge: Hon. Ronald M. Whyte

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Please take notice that on February 17, 2012 at 2:00 p.m. in Courtroom 6 before the  
3 Honorable Ronald M. Whyte, pursuant to Federal Rules of Civil Procedure 23(c)(2) and (e),  
4 Plaintiffs hereby move, unopposed, for Preliminary Approval of Class Action Settlement. This  
5 motion is made on the grounds that the parties have reached a settlement of this action for which  
6 preliminary approval is required. A copy of the Settlement Agreement and exhibits thereto are  
7 attached hereto as Exhibit 1.

8 This motion is based on this notice of motion and motion, the accompanying memorandum  
9 of points and authorities, the Settlement Agreement and exhibits thereto attached hereto as Exhibit  
10 1, the declarations of plaintiffs' lead counsel Ira P. Rothken, Stuart A. Davidson, Jennifer Sarnelli  
11 and Behram V. Parekh, attached to the memorandum of points and authorities as Exhibits A-D,  
12 respectively, the papers on file in this action and such oral or documentary evidence that may be  
13 presented at the hearing of this motion.

14 Respectfully submitted,

15 ROTHKEN LAW FIRM

16 Dated: February 10, 2012 By:

  
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