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5 Co-Lead Counsel for Plaintiffs and the Proposed Class

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN JOSE DIVISION**

10 IN RE APPLE IPHONE 4 PRODUCTS
11 LIABILITY LITIGATION

MDL Docket No. 10-2188 (RMW)

12 _____
13 THIS DOCUMENT RELATES TO:

14 All Actions

**DECLARATION OF STUART A.
DAVIDSON IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS
SETTLEMENT**

15 DATE: February 17, 2012
16 TIME: 2:00 P.M.
17 CTRM: 8, 4th Floor

18 Judge: Hon. Ronald M. Whyte

19 I, STUART A. DAVIDSON, declare:

- 20
- 21 1. I am a member in good standing of the State Bar of Florida, and a partner
22 with the law firm Robbins Geller Rudman & Dowd LLP, attorneys of record
23 for Plaintiffs in this action. I am also a Co-Lead Counsel in this litigation. I
24 have personal knowledge of the facts below, and would competently testify
25 thereto.
 - 26 2. I have approximately fifteen (15) years of litigation experience. During this
27 time, I have prosecuted a substantial number of consumer actions, and have
28 served as Lead Counsel in numerous of these actions.

IN RE APPLE IPHONE 4 PRODUCTS
LIABILITY LITIGATION

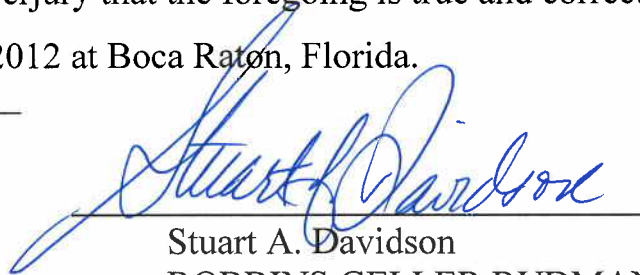
DECLARATION OF STUART A.
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1 3. Based on my experience handling consumer class actions and other cases
 2 similar to this case, I believe that the settlement of this action is appropriate
 3 and the settlement terms are fair, adequate and reasonable. I have based
 4 these conclusions on, *inter alia*, what I have learned regarding the strengths
 5 and weaknesses of the case from the independent investigation Plaintiffs have
 6 conducted, the information that Plaintiffs have obtained from Defendants and
 7 the information that Defendants have obtained from Plaintiffs. After
 8 considering the strengths and weaknesses of Plaintiffs' case, the strength and
 9 weaknesses of Defendants' defenses and the substantial expense, delay and
 10 risk inherent in further litigation through trial, and potentially, appeals, the
 11 terms of the settlement appear fair, adequate and reasonable and in the best
 12 interests of the proposed class.

13 4. The settlement was the product of many months of arm's length negotiations
 14 between counsel, including, but not limited to mediations conducted by Hon.
 15 Daniel Weinstein (Ret.) and Cathy Yanni of JAMS and numerous
 16 independent negotiations.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed
 18 this 10th day of February, 2012 at Boca Raton, Florida.

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20
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