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9 Co-Lead Counsel for Plaintiffs and the Proposed Class

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN JOSE DIVISION**

13 IN RE APPLE IPHONE 4 PRODUCTS  
LIABILITY LITIGATION

MDL Docket No. 10-2188 (RMW)

14 THIS DOCUMENT RELATES TO:  
 15 All Actions

16 **DECLARATION OF BEHRAM V.**  
 17 **PAREKH IN SUPPORT OF MOTION**  
 18 **FOR PRELIMINARY APPROVAL OF**  
 19 **CLASS SETTLEMENT**

20 DATE: February 17, 2012  
 21 TIME: 2:00 P.M.  
 22 CTRM: 8, 4th Floor

Judge: Hon. Ronald M. Whyte

23 I, Behram V. Parekh, declare:

- 24 1. I am a member in good standing of the State Bar of California and a member  
 25 of the bar of this Court. I am of counsel to Kirtland & Packard LLP, counsel  
 26 of record for Plaintiffs in this action. I am also a Co-Lead Counsel in this  
 27 litigation. I have personal knowledge of the facts below, and would  
 28 competently testify thereto.
2. I have approximately sixteen (16) years of litigation experience prosecuting  
 class actions and complex litigation on behalf of plaintiffs. During this time,

I have prosecuted a substantial number of consumer class actions, and have served as Lead and Co-Lead Counsel in numerous of these actions.

3. Based on my experience handling consumer class actions and other cases similar to this case, I believe that the settlement of this action is appropriate and the settlement terms are fair, adequate and reasonable. I have based these conclusions on, *inter alia*, what I have learned regarding the strengths and weaknesses of the case from the independent investigation Plaintiffs have conducted, the information that Plaintiffs have obtained from Defendant and the information that Defendant has obtained from Plaintiffs. After considering the strengths and weaknesses of Plaintiffs' case, the strength and weaknesses of Defendant's defenses and the substantial expense, delay and risk inherent in further litigation through trial, and potentially, appeals, the terms of the settlement appear fair, adequate and reasonable and in the best interests of the proposed class.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of February, 2012 at El Segundo, California.

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/s/ Behram V. Parekh  
BEHRAM V. PAREKH