


EXHIBIT A

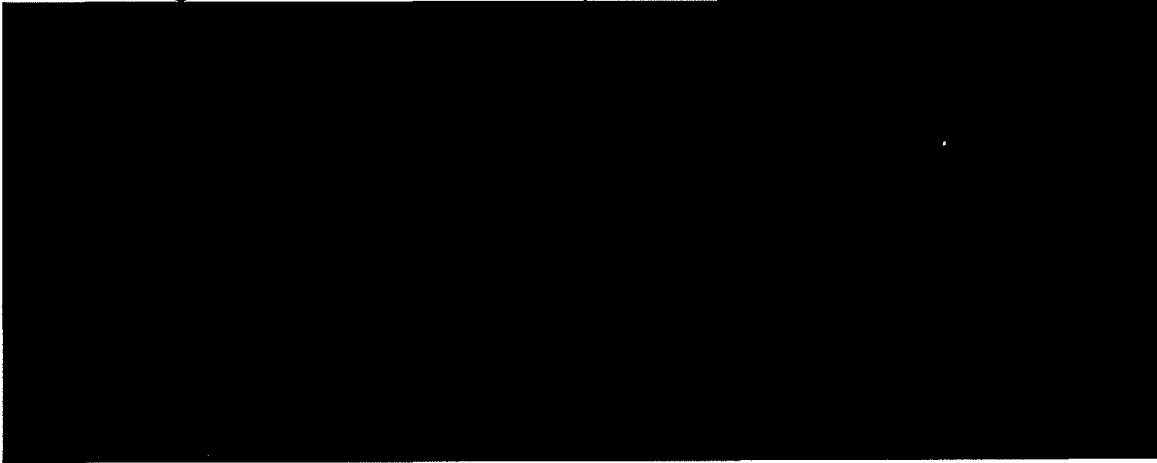
DECLARATION OF JUDITH A. ZAHID

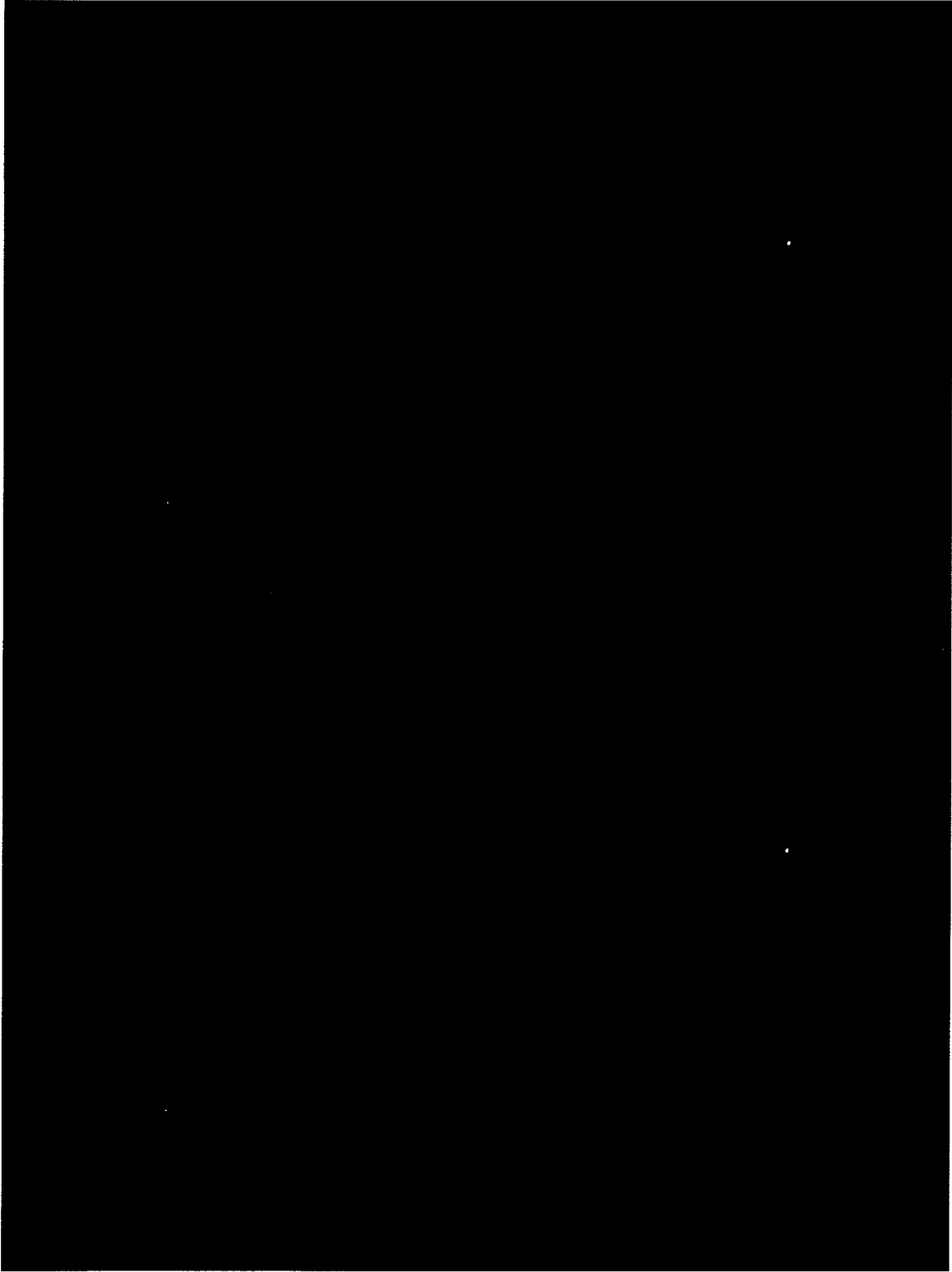
I, Judith A. Zahid, declare as follows:

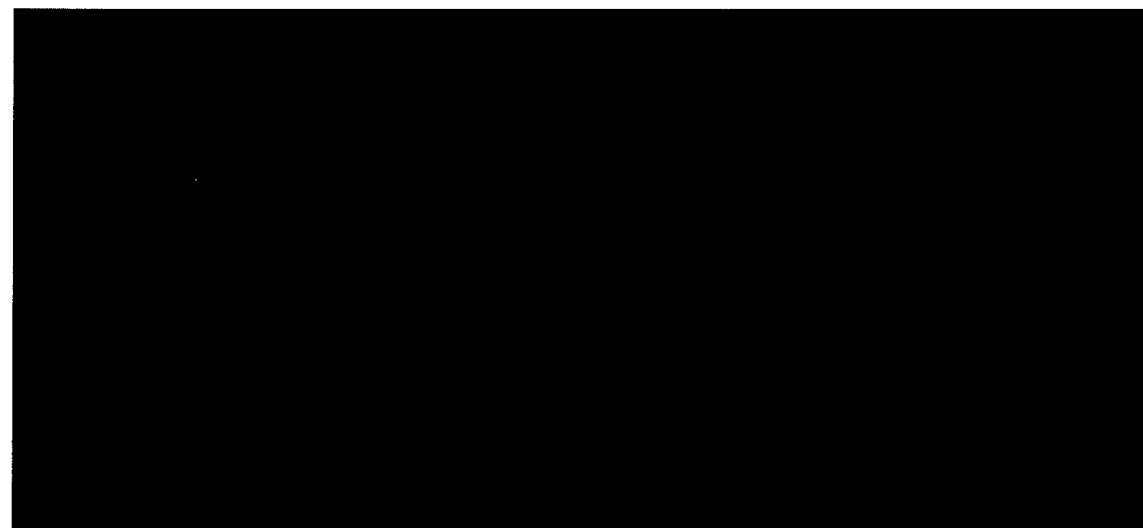
1. I am a partner of the law firm of Zelle Hofmann Voelbel & Mason LLP, and my firm serves as counsel of record for plaintiffs in this consolidated action. I submit this Declaration in support of Class Plaintiffs' motion to compel Dell to produce certain transactional sales data, in accordance with their written agreement with Class Plaintiffs. The matters set forth herein are within my personal knowledge except as to those facts which I state upon information and belief, as to which I believe them to be true. If called upon and sworn as a witness I could competently testify regarding them.

2. On or about June 22, 2006, the parties served subpoenas on multiple third-party original equipment manufacturers (OEMs), including Dell Corporation ("Dell"), which requested both documents and data relevant to their purchase and sale of x86 microprocessors, as well as personal computers containing x86 microprocessors. A true and correct copy of the subpoena is attached hereto as Exhibit 1. The parties promptly coordinated with each other, and particular attorneys from each party took responsibility for particular third-party negotiations. Early on, I became directly involved in the data negotiations for the majority of the subpoenaed OEMs, including Dell.

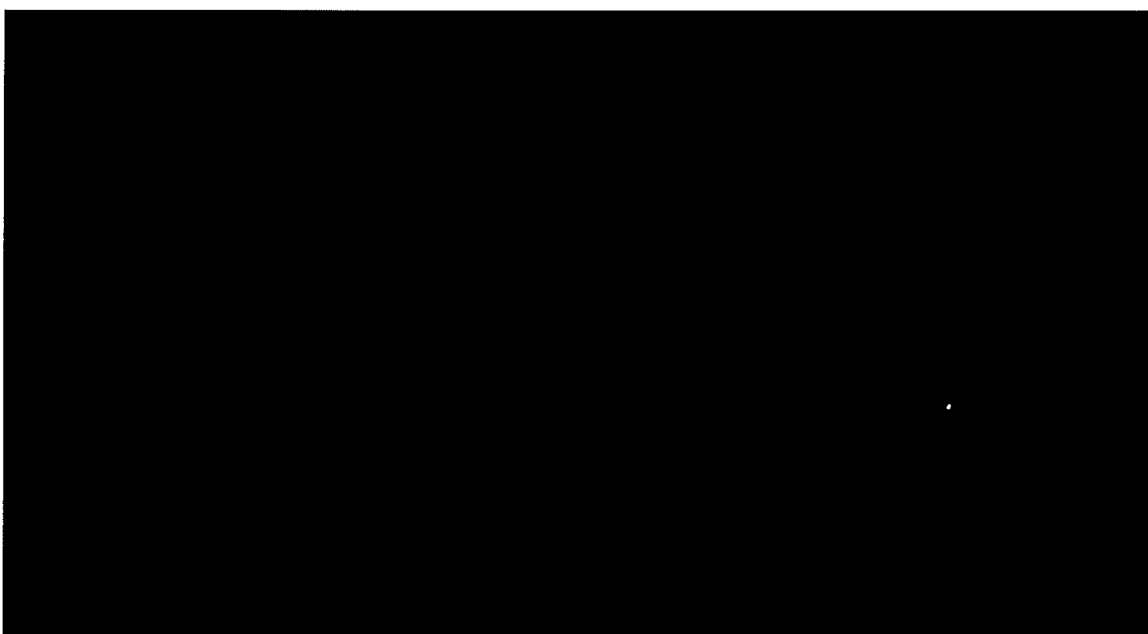
3. Beginning in early 2007, Dell provided the parties with samples of six days of data reflecting Dell's U.S. transactional x86 computer sales. 







7. The second, and most recent production, was sent to me on April 28, 2009. At first glance, it appeared to be a full production, judging by its size alone. Our economists performed a cursory analysis of the data and asked Dell all of their last follow-up interpretation questions on May 6, 2009. Dell did not provide a complete set of answers until May 22, 2009. *See* e-mail string ending with an e-mail dated May 22, 2009 from Christopher S. Maynard, Exhibit 11. Only after receiving these final answers, could we proceed to process the full data set for a pass-through analysis.



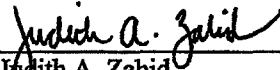
[REDACTED]

9. I contacted Dell's counsel on Monday, June 8, 2009, immediately after our economists made this discovery. See e-mail string ending with an e-mail dated June 9, 2009 from Thomas R. Jackson, Exhibit 12. Despite voice-messages, phone calls, and more than 20 e-mail exchanges over the course of 48 hours, Dell refused to commit to correcting the data production to conform to our agreement [REDACTED]

[REDACTED] I subsequently withdrew this offer after Dell's counsel questioned Class Plaintiffs' need for the data.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Dated: June 11, 2009



Judith A. Zahid