

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE ELECTRONIC BOOKS ANTITRUST)
LITIGATION)

No. 11-md-02293 (DLC)
ECF Case

This Document Relates to:

THE STATE OF TEXAS, et. al.,)

Plaintiffs,)

Civil Action No. 12-cv-6625

v.)

HACHETTE BOOK GROUP, INC., et. al.,)

Defendants.)
_____)

**SECOND SUPPLEMENTAL MEMORANDUM IN SUPPORT OF PLAINTIFF STATES'
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENTS
AND PROPOSED CONSUMER NOTICE AND DISTRIBUTION PLAN**

On August 29, 2012, Plaintiff States filed their Notice of Motion for Preliminary Approval of Settlements and Proposed Consumer Notice and Distribution Plan, together with a Memorandum in Support of that Motion ("Memorandum in Support"). Attached to the Memorandum in Support were numerous Appendices. Several of the original Appendices were revised and two new appendices were added to the Plaintiff States' First Supplemental Memorandum in Support filed on September 14, 2012. Several of the Appendices have again been revised and corrected, in part, as directed by the Court. Attached to this Second Supplemental Memorandum in Support are the following Appendices:

- 1) Second Supplemental Appendix H (Notice Plan): Exhibits A, B, & D
- 2) Second Supplemental Appendix J (Proposed Order)

- 3) Second Supplemental Appendix K (Claim Form) (New)
- 4) Second Supplemental Appendix L (Exclusion Form) (New)

The text of the originally filed Memorandum in Support remains unchanged, and all other Appendices remain as attached to the original filed Memorandum in Support or as attached to the First Supplemental Memorandum in Support.

Dated: September 14, 2012

Respectfully submitted,

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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing Plaintiff States' Second Supplemental Memorandum in Support of Motion for Preliminary Approval of Settlements and Proposed Notice and Distribution Plans was served this 14th day of September, 2012, via the Court's Electronic Case Filing system, on the following:

For Defendant HarperCollins Publishers, LLC:

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Dated: September 14, 2012



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