

Exhibit A

SUPPLEMENTAL 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 Supplemental Declaration in further 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. Class Plaintiffs understand that



4. Attached hereto as Exhibit 13 is a true and correct copy of a portion of the 6 days of sample data that Dell provided to Class Plaintiffs in 2007, which data were assembled based on



5. Attached hereto as Exhibit 14 is a true and correct copy of a portion of [REDACTED]

[REDACTED] As the data in

Exhibit 14 reflect, [REDACTED]
[REDACTED]

Dated: June 19, 2009

Judith A. Zahid

Judith A. Zahid