

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>DAVID DATE, JR.,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SONY ELECTRONICS, INC. and ABC APPLIANCE, INC. d/b/a/ ABC WAREHOUSE,</p> <p style="text-align: right;">Defendants.</p>	<p>Case No. 2:07-cv-15474-PDB-RSW</p> <p>Hon. Paul D. Borman</p> <p>Date: March 17, 2008 Time: 11:00 a.m.</p>
<p>Nancy Sher Cohen Ronald A. Valenzuela HELLER EHRMAN LLP 333 South Hope Street, 39th Floor Los Angeles, CA 90071-3043 (213) 689-0200</p> <p>Attorneys for Sony Electronics Inc. and ABC Appliance, Inc.</p> <p>Richard Zuckerman HONIGMAN MILLER SCHWARTZ AND COHEN LLP 2290 First National Building Detroit, Michigan 48226 (313) 465-7618</p> <p>Attorneys for Sony Electronics Inc.</p>	<p>Lance A. Raphael THE CONSUMER ADVOCACY CENTER, P.C. 180 West Washington Street, Suite 700 Chicago, IL 60602 (312) 782-5808</p> <p>Alan Mansfield John Hanson ROSNER & MANSFIELD, LLP 10085 Carroll Canyon Road, First Floor San Diego, CA 92131 (858) 348-1005</p> <p>Dani K. Liblang LIBLANG & ASSOCIATES, P.C. 260 East Brown Street, Ste. 320 Birmingham, MI 48009</p> <p>Attorneys for David Date, Jr.</p>

**DECLARATION OF JEFF GOLDSTEIN
IN SUPPORT OF JOINT APPLICATION
FOR PRELIMINARY APPROVAL OF SETTLEMENT OF CLASS ACTION**

I, Jeff Goldstein, declare as follows:

I am Vice President of Sony Electronics Inc.'s ("SEL") Home Products Marketing Division, responsible primarily for television marketing in the United States. I submit this declaration in support of the Joint Application For Preliminary Approval of Settlement of Class Action. I have personal knowledge of the facts set forth below and, if called as a witness, I could and would competently testify thereto.

1. SEL introduced the Sony-brand, rear-projection, high-definition television models KDS R50XBR1 and KDS R60XBR1 (the "XBR1 Televisions") in the United States in Summer 2005. SEL introduced the Sony-brand, rear-projection, high-definition television models KDS 70Q006 and KDX 46Q005 ("the QUALIA Televisions") in the United States in 2004. Industry commentators and critics gave very favorable reviews of these four models.

2. SEL marketed and distributed the vast majority of the Televisions through third-party retailers with the last shipment to any third party retailer made by SEL in September 2006. SEL sold a small number of these Televisions directly to the public via its online store, SonyStyle.com and at SEL's SonyStyle direct retail and outlet locations. In all, SEL sold to consumers and retailers approximately 172,000 XBR1 Televisions and 3,000 QUALIA Televisions.

3. In the Summer and Fall of 2006, SEL introduced a new high-definition television product line to succeed the XBR1 Televisions, all of which accept 1080p video signals, incorporate newer technology, and which are not at issue in the above-referenced lawsuit. The QUALIA Televisions were never succeeded by a second generation product line. There are no plans to begin manufacturing the QUALIA or XBR1 Televisions again.

4. After the successors to the XBR1 Televisions were introduced in Fall 2006, SEL did continue to sell a limited number of XBR1 Televisions (mostly

refurbished and not new units) through its direct Sonystyle online and retail channels. On or about December 27, 2007, however, SEL no longer sold the XBR1 Televisions through any of its sales channels, namely, its own direct online store or retail locations. SEL sent the last shipment of XBR1 Televisions to retailers in September 2006.

5. Accordingly, SEL no longer manufactures, markets or sells these XBR1 Televisions to consumers in the United States, will not in the future, does not produce or distribute marketing or promotional materials for these models, and does not advertise these models in print, radio, television, Internet, or any other media.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of March, 2008, at San Diego, California.



JEFF GOLDSTEIN

CERTIFICATE OF SERVICE

I, Debora Biggers, declare as follows:

I am employed with the law firm of Heller Ehrman LLP, whose address is 333 South Hope Street, 39th Floor, Los Angeles, CA 90071-3043. I am readily familiar with the business practices of this office for collection and processing of correspondence for mailing with the United States Postal Service; I am over the age of eighteen years and not a party to this action.

I hereby certify that on March 12, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of each filing to the following: **Dani K. Liblang, Douglas C. Salzenstein and Richard E. Zuckerman** and I hereby certify that I have mailed by United States Postal Service the pages to the following non-ECF participants:

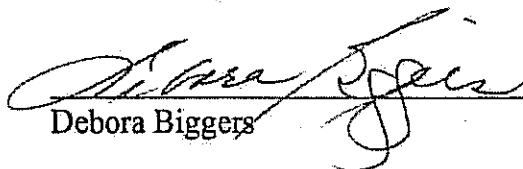
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I declare that I am employed in the office of a member of the bar of this Court at whose direction this service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Los Angeles, California on March 12, 2008.


Debora Biggers

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