

EXHIBIT 29

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10
11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 _____)
14 IN RE HEWLETT-PACKARD COMPANY)

15 SHAREHOLDER DERIVATIVE LITIGATION)

16 _____)
17 THIS DOCUMENT RELATES TO:)

18 ALL ACTIONS)

MASTER DOCKET

NO. C-12-6003 CRB

**[PROPOSED] SUR-REPLY
DECLARATION OF JEFFREY S.
ABRAHAM IN SUPPORT OF
[PROPOSED] SUR-REPLY
SETTLEMENT OBJECTION**

[PUBLIC VERSION]

1 I, JEFFREY S. ABRAHAM, declare as follows:

2 1. I am a partner at Abraham, Fruchter & Twersky, LLP (“AF&T”) one of the
3 counsel for Harriet Steinberg (“Steinberg”) in the above-captioned action. I respectfully submit
4 this declaration in support of Steinberg’s proposed sur-reply settlement objection.

5 2. As a condition to participating in a meeting with the DRC’s counsel, Steinberg’s
6 counsel was required to sign a highly restrictive confidentiality agreement prohibiting -- and still
7 presumably prohibiting -- Steinberg from revealing any of the contents or discussions at that
8 meeting. *See* Dkt. No. 218-3. No documents were provided to Steinberg’s counsel who, instead,
9 received an oral presentation from the DRC counsel which appears to have based upon the slide
10 decks in the DRC Presentation.

11 3. The Settling Plaintiffs have purportedly interviewed Apotheker and Robison but
12 have failed to share the notes or results of those interviews with the Court or with Steinberg.
13 Similarly, although the DRC has purportedly interviewed dozens of witnesses, there appear to be
14 no transcripts of those interviews and the notes of those interviews have not been produced.

15 **Exhibit Filed Under Seal**

16 4. Attached hereto as Exhibit 58, is a true and correct copy of excerpts from a
17 presentation (the “Presentation”), which was produced by HP and bates stamped
18 HP_DER3_00012568 through HP_DER3_00013856.

19 **Publicly Available Exhibit**

20 5. Attached hereto as Exhibit 59, is a true and correct copy of a Form 8-K filed by
21 HP with the Securities and Exchange Commission on or about March 20, 2013.

22 I declare under penalty of perjury that the foregoing is true and correct

23 Executed this 22nd day of July 2015.

24
25 /s/ Jeffrey S. Abraham
Jeffrey S. Abraham
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