

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

CAVAN PARTNERS, LP, a DELL VALUATION)	
TRUST participant,)	
)	
Petitioner,)	
)	
v.)	C.A. No. 9046-CS
)	
DELL INC.,)	
)	
Respondent.)	

**RESPONDENT’S VERIFIED LIST
PURSUANT TO 8 DEL. C. § 262(f)**

The undersigned, a duly appointed representative of Respondent Dell Inc., in compliance with the provisions of Section 262(f) of the General Corporation Law of the State of Delaware, does hereby state as follows:

1. I am Principal Legal Counsel of Dell Inc. (the “Company”), the respondent in this action and the surviving corporation with respect to the merger (the “Merger”) effected pursuant to an Agreement and Plan of Merger dated as of February 5, 2013, by and among the Company, Denali Holding, Inc., Denali Intermediate Inc. and Denali Acquiror Inc., as amended by Amendment No. 1 thereto, dated as of August 2, 2013 (the “Merger Agreement”), effective October 29, 2013 (the “Effective Date”).

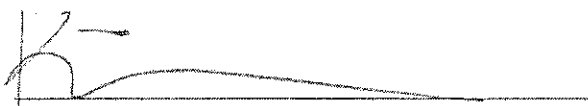
2. In my capacity as Principal Legal Counsel of the Company, I have custody of certain books and records of the Company, including the demands for appraisal received in connection with the Merger.

3. The Merger was approved by a vote of the Company's stockholders taken at a special meeting held on September 12, 2013.

4. Prior to the taking of the vote on the Merger described in paragraph 3 above, the Company received purported appraisal demands from the persons listed on Exhibit A hereto, which persons have not withdrawn their demands and with which persons the Company has not reached agreement as to the value of the shares as to which appraisal has been demanded.

5. Exhibit A hereto also identifies the reasons presently known to the Company for believing that certain of the purported appraisal demands are insufficient as a matter of law. The Company reserves the right to amend or supplement the objections listed on Exhibit A as discovery in this matter may warrant.

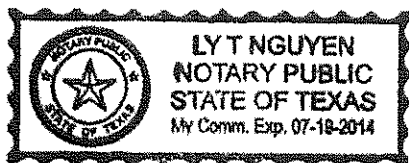
6. The undersigned hereby affirms, under penalty of perjury, that the information set forth above is true and complete, to the best of the undersigned's knowledge, information and belief.

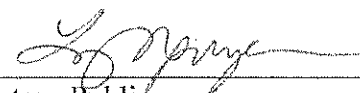


Kim Erlanson
Principal Legal Counsel, Dell Inc.

STATE OF TEXAS)
)
COUNTY OF TRAVIS) SS.

SWORN TO AND SUBSCRIBED before me
this 25th day of November, 2013.





Notary Public
Commission Expires: 7-19-2014