UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

Civil Action No. 11-01560 (ESH)

v.

AT&T INC., T-MOBILE USA, INC., and DEUTSCHE TELEKOM AG,

Defendants.

PLAINTIFF'S UNOPPOSED MOTION TO ENTER STIPULATED PROTECTIVE ORDER CONCERNING CONFIDENTIALITY

Plaintiff, the United States of America, respectfully moves the Court, pursuant to Fed. R. Civ. P. 26(c)(1)(G), to enter the attached, proposed Stipulated Protective Order Concerning Confidentiality. Pursuant to LCvR 7(m), counsel for the parties have conferred and counsel for Defendants does not oppose this motion.

Dated this 15th day of September 2011.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

__/s/ Matthew C. Hammond____ Claude F. Scott, Jr. (D.C. Bar #414906) Matthew C. Hammond Attorneys U.S. Department of Justice, Antitrust Division Telecommunications & Media Enforcement Section 450 Fifth Street, N.W., Suite 7000 Washington, DC 20530 Phone: (202) 514-5621

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