EXHIBIT F

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, STATE OF NEW YORK, STATE OF WASHINGTON, STATE OF CALIFORNIA, STATE OF ILLINOIS, COMMONWEALTH OF MASSACHUSETTS, STATE OF OHIO, AND COMMONWEALTH OF PENNSYLVANIA,

Plaintiffs,

v.

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

Defendants.

DECLARATION OF JOHN JANHUNEN IN SUPPORT OF NON-PARTY GOOGLE INC.'S MOTION FOR ADDITIONAL RELIEF UNDER THE PROTECTIVE ORDER

JOHN JANHUNEN hereby declares as follows:

- 1. I am Corporate Counsel at Google Inc. ("Google"). I submit this declaration in support of Google's motion for additional relief under the protective order currently in place in the above-captioned action ("this Action").
- 2. I oversaw the document production that Google made to the United States Department of Justice ("DOJ") in response to Civil Investigative Demand No. 26542 (the "CID"). I am personally familiar with the general subject matter of the documents that Google produced to the DOJ in response to the CID.
- Google produced highly confidential and competitively sensitive documents to the DOJ in response to the CID, including but not limited to product development and launch plans related to Android.

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Hon. Ellen S. Huvelle

4. I understand that the protective order currently in place in this Action may allow the parties to use the documents from Google's production in pleadings and open court, and share them with experts they retained, without first notifying Google and giving Google an opportunity to explain to the Court the harm that would occur from such use. Google would be harmed by this procedure, as it would not be able to explain to the Court in advance of disclosure the confidential nature of the subject matter of its documents, and the business, competitive and financial injury that would result from disclosure of those documents on the public record, in open court or to a particular expert retained by the Defendants in this Action (for instance if that expert regularly performs work for one of Google's competitors).

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

Executed on the 26th day of September, 2011, at Mountain View, California.

John Janhunen