

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.

Civil Action No. 1:11-cv-01560-ESH

Hon. Ellen S. Huvelle

MOTION FOR ADDITIONAL RELIEF UNDER THE PROTECTIVE ORDER

Pursuant to Paragraph B.2 of the Stipulated Protective Order Concerning Confidentiality entered in the above-captioned matter (the “Protective Order”) (Dkt. 24), non-party Google Inc. (“Google”) moves for additional relief under the Protective Order. Google moves to modify the Protective Order to impose certain minimum notice requirements before any party may disclose Confidential Information of Google to the public or to testifying or consulting experts, as set forth in the accompanying Memorandum of Law and Proposed Order.

WHEREFORE, Google moves for an Order modifying the Protective Order as set forth in the accompanying Memorandum of Law and Proposed Order.

Dated: September 26, 2011

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