

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 1:11-cv-01560-ESH
)	
AT&T INC., et al.,)	
)	
<i>Defendants.</i>)	
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SPRINT NEXTEL CORPORATION,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:11-cv-01600-ESH
)	
AT&T INC., et al.,)	
)	
<i>Defendants.</i>)	
<hr/>		
CELLULAR SOUTH, INC., et al.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:11-cv-01690-ESH
)	
AT&T INC., et al.,)	
)	
<i>Defendants.</i>)	
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[PROPOSED] ORDER

Upon review and consideration of the Joint Motion to Amend the Protective Order Pursuant to Rule 26(c) of Sprint Nextel Corporation, Cellular South, Inc. and Corr Wireless Communications, L.L.C., and any opposition thereto, it is hereby

ORDERED that the motion is **GRANTED**; and it is further

ORDERED that Sprint, Cellular South and Corr Wireless shall be bound by the terms of Paragraph 10 of the Amended Stipulated Protective Order Concerning Confidentiality (“Protective Order”) entered in *United States, et al. v. AT&T Inc., et al.*, Civil No. 11-01560-ESH (“DOJ Case”), Docket No. 42; and it is further

ORDERED that Paragraph 1 of the Protective Order shall be modified to add a new 1.(n) and a new 1.(o) that read as follows:

(n) “Cellular South” means Cellular South, Inc., and Corr Wireless Communications, L.L.C., their divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing.

(o) “Sprint” means Sprint Nextel Corporation, its divisions, subsidiaries, affiliates, partnerships and joint ventures, and all directors, officers, employees, agents, and representatives of the foregoing.

ORDERED that Paragraph 9 of the Protective Order shall be modified to add a new 9.(h) and 9.(i) that read as follows:

(h) outside counsel acting for Cellular South in *Cellular South, Inc. and Corr Wireless Communications, L.L.C. v. AT&T Inc., AT&T Mobility LLC, T-Mobile USA, Inc., and Deutsche Telekom AG, Civil No. 11-01690 (ESH)*, that counsel’s employees, independent contractors assisting such outside counsel, and testifying or consulting experts retained by Cellular South to assist in the prosecution of that action, including employees of the firm with which the expert or consultant is associated or independent contractors to the extent necessary to assist the expert’s work in that action.

(i) outside counsel acting for Sprint in *Sprint Nextel Corporation v. AT&T Inc., AT&T Mobility LLC, T-Mobile USA, Inc., and Deutsche Telekom AG, Civil No. 11-01600 (ESH)*, that counsel’s employees, independent contractors assisting such outside counsel, and testifying or consulting experts retained by Sprint to assist in the prosecution of that action, including employees of the firm with which the expert or consultant is associated or independent contractors to the extent necessary to assist the expert’s work in that action.

ORDERED that Paragraph 14 of the Protective Order is amended to read as follows:

14. All materials produced or exchanged in connection with this Action, including but not limited to Confidential Information, produced by a Party or a non-party as part of this proceeding shall be used solely for purposes of the

conduct of this Action; *Cellular South, Inc. and Corr Wireless Communications, L.L.C. v. AT&T Inc., AT&T Mobility LLC, T-Mobile USA, Inc., and Deutsche Telekom AG, Civil No. 11-01690 (ESH)*; or *Sprint Nextel Corporation v. AT&T Inc., AT&T Mobility LLC, T-Mobile USA, Inc., and Deutsche Telekom AG, Civil No. 11-01600 (ESH)* and shall not be used for any business, commercial, competitive, personal, or other purpose.

IT IS SO ORDERED.

DATED: _____, 2011

Hon. Ellen S. Huvelle
UNITED STATES DISTRICT JUDGE

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