

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA et al.,

Plaintiffs,

v.

AT&T INC. et al.,

Defendants.

Civil Action No. 11-01560 (ESH)

**UNITED STATES' UNOPPOSED MOTION TO ENTER SECOND AMENDED
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 Second Amended Stipulated Protective Order Concerning Confidentiality. Entry of the proposed Order would resolve issues raised in non-party Google Inc.'s Motion for Additional Relief under the Protective Order, and also makes minor changes, recognizing, for instance, the appointment of Special Master Levie. A version of the proposed Order showing the proposed changes to the existing Protective Order is also attached. Pursuant to LCvR 7(m), counsel for the parties and non-party Google have conferred and none oppose this motion.

Dated this 8th day of November 2011.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

/s/ Matthew C. Hammond
Matthew C. Hammond
Attorney
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
Facsimile: (202) 514-6381
matthew.hammond@usdoj.gov

CERTIFICATE OF SERVICE

I, Matthew C. Hammond, hereby certify that on November 8, 2011, I caused a true and correct copy of the foregoing United States' Unopposed Motion to Enter Second Amended Stipulated Protective Order Concerning Confidentiality to be served via electronic mail on:

For Defendant AT&T Inc.:

Steven F. Benz
Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
sbenz@khhte.com

For Defendants T-Mobile USA, Inc. and Deutsche Telekom AG:

Patrick Bock
Cleary Gottlieb Steen & Hamilton LLP
pbock@cgsh.com

For Plaintiff States:

Geralyn J. Trujillo
Office of the Attorney General, State of New York
geralyn.trujillo@ag.ny.gov

David M. Kerwin
Office of the Attorney General, State of Washington
davidk3@atg.wa.gov

For Google, Inc.:

John D. Harkrider
Daniel S. Bitton
Axinn, Veltrop & Harkrider LLP

/s/ Matthew C. Hammond