

**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)

JOINT MOTION TO STAY

Plaintiffs and Defendants respectfully move for entry of the attached proposed Order staying this action.

Dated this 12th day of December 2011.

Respectfully submitted:

Richard L. Schwartz
Geralyn J. Trujillo
Mary Ellen Burns
Keith H. Gordon
Matthew D. Siegel
Counsel for the State of New York

David M. Kerwin
Jonathan A. Mark
Counsel for the State of Washington

Quyen D. Toland
Ben Labow
Counsel for the State of California

Robert W. Pratt
Chadwick O. Brooker
Counsel for the State of Illinois

William T. Matlack
Michael P. Franck
Counsel for the Commonwealth of Massachusetts

Jessica L. Brown
Counsel for the State of Ohio

James A. Donahue, III
Joseph S. Betsko
Counsel for the Commonwealth of Pennsylvania

José G. Díaz-Tejera
Nathalia Ramos-Martínez
Counsel for the Commonwealth of Puerto Rico

FOR PLAINTIFFS:

/s/ Joseph F. Wayland
Joseph F. Wayland
Deputy Assistant Attorney General

/s/ Matthew C. Hammond
Matthew C. Hammond

Laury E. Bobbish
Claude F. Scott, Jr. (D.C. Bar #414906)
Kenneth M. Dintzer
Christine A. Hill (D.C. Bar #461048)
U.S. Department of Justice
Antitrust Division
450 Fifth Street, N.W., Suite 7000
Washington, D.C. 20530
Tel: (202) 514-5621
Fax: (202) 514-6381
matthew.hammond@usdoj.gov
Counsel for the United States of America

FOR DEFENDANTS:

/s/ Mark C. Hansen

Mark C. Hansen, D.C. Bar # 425930
Michael K. Kellogg, D.C. Bar # 372049
Kellogg, Huber, Hansen, Todd,
Evans & Figel, P.L.L.C.
1615 M Street, NW, Suite 400
Washington, DC 20036
(202) 326-7900

Richard L. Rosen, D.C. Bar # 307231
Donna E. Patterson, D.C. Bar # 358701
Arnold & Porter LLP
555 Twelfth Street, NW
Washington, DC 20004-1206
(202) 942-5000

Wm. Randolph Smith, D.C. Bar # 356402
Kathryn D. Kirmayer, D.C. Bar # 424699
Crowell & Moring, LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 624-2500

Counsel for AT&T Inc.

George S. Cary, D.C. Bar # 285411
Mark W. Nelson, D.C. Bar # 442461
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 974-1500

Richard G. Parker, D.C. Bar # 327544
O'Melveny & Myers LLP
1625 Eye Street, NW
Washington, DC 20006
(202) 383-5300

*Counsel for T-Mobile USA, Inc. and
Deutsche Telekom AG*

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)

[PROPOSED] ORDER

Upon agreement of the parties, it is hereby ORDERED that this action be stayed and that all pretrial and trial deadlines established under prior Orders of the Court be vacated, including the hearing in this action previously scheduled for December 15, 2011.

It is further ORDERED that a status conference shall be held in this action on January 18, 2012 at 2 p.m. to address the course of any further proceedings in this action.

It is further ORDERED that Defendants shall file with the Court by noon on January 12, 2012 a status report describing the status of their proposed transaction, including discussion of whether they intend to proceed with the transaction at issue in this litigation, whether they intend to proceed with another transaction, the status of any related proceedings at the Federal Communications Commission, and their anticipated plans and timetable for seeking any necessary approval from the Federal Communications Commission.

SO ORDERED this _____ day of December, 2011.

BY THE COURT:

Ellen S. Huvelle
U.S. District Judge