

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

IN RE: APPLE IPHONE 3G AND 3GS MMS  
MARKETING AND SALES PRACTICES  
LITIGATION

THIS DOCUMENT RELATES TO ALL  
ACTIONS

MDL NO. 2116

2:09-md-2116

SECTION: J

JUDGE BARBIER

MAGISTRATE JUDGE WILKINSON

**DECLARATION OF LARRY B. WHITE  
IN SUPPORT OF DEFENDANT AT&T  
MOBILITY LLC'S MOTIONS TO  
COMPEL ARBITRATION**

I, Larry B. White, hereby declare as follows:

1. The following facts are of my own personal knowledge, and if called as a witness I could and would testify competently as to their truth.

2. I am employed by AT&T Services, Inc., an affiliate of AT&T Mobility LLC ("ATTM"), as Senior Business Manager in the AT&T Mailing Solutions group. I am familiar with the policies and procedures by which ATTM generates and distributes inserts to the bills sent to its direct-billed customers and the manner in which information pertaining to those inserts and bills are stored and retrieved in the regular and ordinary course of business by ATTM and its print vendor.

3. In March 2009, ATTM sent a Notice of Revised Arbitration Clause to its direct-billed subscribers along with their monthly paper bills. A true and correct copy of the Notice of Revised Arbitration Clause sent to direct-billed subscribers who received their bills in English is attached as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 6, 2010, at Atlanta, Georgia.

A handwritten signature in black ink, appearing to read "L.B. White", is written over a horizontal line.

Larry B. White