

**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  
CASES

MDL NO. 2116

2:09-md-2116

SECTION: J

JUDGE BARBIER

MAGISTRATE JUDGE WILKINSON

**MOTION FOR PROTECTIVE ORDER**

Please take notice that on November 24, 2010, at 9:30 a.m., pursuant to Federal Rule of Civil Procedure 26(c), Defendant AT&T Mobility LLC (“ATTM”) will move and hereby does move this Court for an protective order barring plaintiffs from taking the Rule 30(b)(6) deposition currently noticed for October 21, 2010, pending the resolution of ATTM’s Motions to Compel Arbitration.

This motion is supported by the accompanying Memorandum of Points and Authorities; the Declaration of Richard Pianka and all exhibits thereto; the accompanying proposed Order; any reply memorandum ATTM may file; and any oral argument ATTM may present.

October 14, 2010

Respectfully submitted,

MAYER BROWN LLP

BY: /s/ Archis A. Parasharami

Archis A. Parasharami

Evan M. Tager

MAYER BROWN LLP

1999 K Street NW

Washington, DC 20006-1101

Kathleen Taylor Sooy

Tracy A. Roman

CROWELL & MORING LLP

1001 Pennsylvania Avenue NW

Washington, DC 20004

Attorneys for Defendant AT&T Mobility LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of October, 2010, I served the foregoing by causing it to be filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to case participants.

/s/ Archis A. Parasharami  
Archis A. Parasharami