

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

United States of America,)	
)	
Plaintiff,)	Civil Action No.: 1:05CV02102 (EGS)
)	
v.)	
)	
SBC Communications, Inc. and)	
AT&T Corp.,)	
)	
Defendants.)	
)	
United States of America,)	
)	Civil Action No.: 1:05CV02103 (EGS)
Plaintiff,)	
)	
v.)	
)	
Verizon Communications Inc. and)	
MCI, Inc.,)	
)	
Defendants.)	
)	

**OPPOSITION OF THE UNITED STATES TO MICHAEL LOVERN’S
MOTION FOR LEAVE TO FILE MOTION FOR RECONSIDERATION**

The United States opposes Michael Lovern’s motion for leave to file a motion for reconsideration pursuant to Rule 60(b) (docketed July 20, 2006) and his motion for reconsideration. It is not clear which, if any, judgment or order Mr. Lovern seeks to have the Court reconsider. (To the extent his motion for reconsideration relates to the Court’s July 7, 2006 scheduling order for the July 12, 2006 hearing, it is now moot.) Nevertheless, Mr. Lovern has not demonstrated that reconsideration is justified under any part of Rule 60(b), and accordingly the motion should be denied. In addition, the United States stands on the arguments

it previously has made in opposition to Mr. Lovern's participation in these proceedings. *See* Opposition of the United States to Michael Lovern, Sr.'s Motion for *Amicus Curiae* and Intervenor Status (filed May 23, 2006). The United States' primary objection to Mr. Lovern's participation is that his concerns regarding the Intercompany Settlement System (ISS) have nothing to do with the proposed Final Judgments, the harm alleged in the Complaints, or even the mergers themselves. Therefore, his participation, as an intervenor or *amicus curiae*, will not assist the Court in any way in making the public interest determination that is before the Court.

Conclusion

The Court should deny Mr. Lovern's motion for leave to file a motion for reconsideration and should deny Mr. Lovern's motion for reconsideration.

Respectfully submitted,

/s/

Laury E. Bobbish
Assistant Chief

/s/

Claude F. Scott, Jr. (D.C. Bar No. 414906)
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Trial Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of August, 2006, I caused a copy of the foregoing United States' Motion for Entry of a Protective Order to be mailed, by U.S. mail, postage prepaid, to the attorneys listed below:

<p>FOR VERIZON</p> <p>John Thorne Verizon Communications, Inc. 1515 North Courthouse Road Arlington, Virginia 22201</p> <p>Mark C. Hansen Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. 1615 M Street, N.W., Suite 400 Washington, DC 20036</p>	<p>FOR AT&T</p> <p>Wm. Randolph Smith Crowell & Moring LLP 1001 Pennsylvania Avenue, N.W. Washington, D.C. 20004</p> <p>FOR MOVANT MICHAEL LOVERN, SR.</p> <p>Michael Lovern, Sr. 3713 Parke Drive Edgewater, Maryland 21037 (206) 202-9074</p>
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_____/s/_____
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