

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

_____)	
UNITED STATES OF AMERICA, STATE OF)	
ALABAMA, STATE OF CALIFORNIA, STATE)	
OF IOWA, STATE OF KANSAS, STATE OF)	
MINNESOTA, STATE OF NORTH DAKOTA,)	
and STATE OF SOUTH DAKOTA,)	
)	Case No. 1:08-cv-01878 (EGS)
<i>Plaintiffs,</i>)	
)	
v.)	
)	
VERIZON COMMUNICATIONS INC. and)	
ALTEL CORPORATION,)	
)	
<i>Defendants.</i>)	
_____)	

UNOPPOSED MOTION TO MODIFY FINAL JUDGMENT

Plaintiff United States and defendants jointly move this Court for an order modifying Section IV.J of the Final Judgment entered in this case. The Final Judgment required defendants to sell wireless businesses in portions of 22 states, and allowed defendants to enter into a transition services agreement with the acquirer(s) for a period of up to one year after the sale. Specifically, the first sentence of Section IV.J of the Final Judgment states:

At the option of the Acquirer(s) of the Divestiture Assets, defendants shall enter into a contract for transition services customarily provided in connection with the sale of a business providing mobile wireless telecommunications services or intellectual property licensing sufficient to meet all or part of the needs of the Acquirer(s) for a period of up to one year, provided that defendants shall only be required to license the Verizon brand to the acquirer(s) of the Divestiture Assets in the CMAs listed in Section II.D.3 for a period of nine (9) months.

In accordance with the Final Judgment, defendants sold the wireless assets to two different acquirers, and entered into one-year transition services agreements with each of them. The proposed modification would change Section IV.J to allow the term of the transition services

agreements to be extended for a four-month period, plus an additional three month period if necessary with the approval of plaintiff United States.

Defendants hereby agree that the proposed Modified Final Judgment submitted to this Court may be filed and entered by this Court at any time, without further notice to any other party, provided that plaintiff United States has not withdrawn its consent, which it may do at any time before the entry of the proposed Modified Final Judgment by serving notice thereof on the defendants and by filing that notice with the court.

Defendants further agree to abide by and comply with the provisions of the proposed Modified Final Judgment as if it were full force and effect as an order of the court, pending the Judgment's entry by this Court, or until expiration of time for all appeals of any Court ruling declining entry of the proposed Modified Final Judgment.

Dated: April 1, 2011

Respectfully submitted,

FOR PLAINTIFF UNITED STATES

FOR DEFENDANTS VERIZON
COMMUNICATIONS INC. AND ALLTEL
CORPORATION

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