

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

UNITED STATES OF AMERICA *et al.*,

*Plaintiffs,*

v.

DEUTSCHE TELEKOM AG, *et al.*,

*Defendants.*

Civil Action No. 1:19-cv-02232-TJK

**STIPULATION**

WHEREAS, plaintiffs, the United States of America and the States of Kansas, Nebraska, Ohio, Oklahoma, and South Dakota, filed their Complaint, Stipulation and Order, and other documents on July 26, 2019;

AND WHEREAS, plaintiffs filed an Amended Complaint on August 15, 2019 adding the State of Louisiana as a plaintiff (Dkt. Nos. 26, 28), along with a Stipulation;

AND WHEREAS, plaintiffs filed a Second Amended Complaint on October 2, 2019 adding the State of Florida as a plaintiff (Dkt. Nos. 33, 45), along with a Stipulation;

AND WHEREAS, the plaintiffs filed a Third Amended Complaint on October 28, 2019 adding the State of Colorado as a plaintiff (Dkt. Nos. 40, 46), along with a Stipulation;

AND WHEREAS, the plaintiffs filed a Fourth Amended Complaint on November 8, 2019 adding the State of Arkansas as a plaintiff (Dkt. Nos. 43, 47), along with a Stipulation;

AND WHEREAS, the United States will bring an unopposed motion for leave to file a Fifth Amended Complaint to join the State of Texas as a plaintiff in this matter;

NOW THEREFORE, the State of Texas hereby stipulates as follows:

The State of Texas joining as a plaintiff does not change the status of this matter, as it agrees to the proposed settlement. The State of Texas also stipulates that a Final Judgment in the form attached to the United States' July 26 Explanation of Consent Decree Procedures (Dkt. No. 2-2) may be filed with and entered by the Court, upon the motion of any party or upon the Court's own motion, at any time after compliance with the requirements of the Antitrust Procedures and Penalties Act (15 U.S.C. § 16), and without further notice to any party or other proceedings, provided that the United States has not withdrawn its consent, which it may do at any time before the entry of the proposed Final Judgment by serving notice thereof on Defendants and by filing that notice with the Court.

Dated: November 27, 2019

STATE OF TEXAS  
Office of the Attorney General



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