

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

UNITED STATES OF AMERICA et al.,

Plaintiffs,

v.

AT&T INC. et al.,

Defendants.

Civil Action No. 11-01560 (ESH)

**UNITED STATES' UNOPPOSED MOTION TO ENTER SECOND AMENDED
STIPULATED PROTECTIVE ORDER CONCERNING CONFIDENTIALITY**

Plaintiff, the United States of America, respectfully moves the Court, pursuant to Fed. R. Civ. P. 26(c)(1)(G), to enter the attached, proposed Second Amended Stipulated Protective Order Concerning Confidentiality. Entry of the proposed Order would resolve issues raised in non-party Google Inc.'s Motion for Additional Relief under the Protective Order, and also makes minor changes, recognizing, for instance, the appointment of Special Master Levie. A version of the proposed Order showing the proposed changes to the existing Protective Order is also attached. Pursuant to LCvR 7(m), counsel for the parties and non-party Google have conferred and none oppose this motion.

Dated this 8th day of November 2011.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

/s/ Matthew C. Hammond
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CERTIFICATE OF SERVICE

I, Matthew C. Hammond, hereby certify that on November 8, 2011, I caused a true and correct copy of the foregoing United States' Unopposed Motion to Enter Second Amended Stipulated Protective Order Concerning Confidentiality to be served via electronic mail on:

For Defendant AT&T Inc.:

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