

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
)  
)  
*Plaintiff,* ) Civil No.: 1:99CV01119(LFO)  
)  
v. )  
)  
)  
BELL ATLANTIC CORPORATION and )  
GTE CORPORATION, )  
)  
*Defendants.* )  
\_\_\_\_\_ )

MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT

Plaintiff United States of America, by and through undersigned counsel, hereby moves this Court pursuant to Federal Rule of Civil Procedure 15(d), for leave to file the Supplemental Complaint attached to this Motion<sup>1</sup> and to add Vodafone AirTouch Plc as a defendant to this proceeding. For the reasons set forth in the accompanying Memorandum of Points and Authorities, the United States respectfully requests that this Court grant it leave to file the Supplemental Complaint because it will promote a complete adjudication of the dispute between the parties and will not cause any prejudice.

The United States discussed this Motion with John Thorne, counsel for defendant Bell Atlantic Corporation, Steven G. Bradbury, counsel for defendant GTE Corporation, and Brian D. Kidney, an authorized representative of Vodafone AirTouch Plc, by telephone on December 3,

---

<sup>1</sup> Also attached to this Motion are a Stipulation and proposed Final Judgment that would resolve this matter.

1999. Defendants and Vodafone AirTouch Plc do not oppose this motion.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
\_\_\_\_\_

Hillary B. Burchuk  
D.C. Bar # 366755  
Lawrence M. Frankel  
D.C. Bar No. 441532  
Susan Wittenberg  
D.C. Bar No. 453692  
Trial Attorneys  
United States Department of Justice  
Antitrust Division  
Telecommunications Task Force  
1401 H Street, N.W., Suite 8000  
Washington, D.C. 20530  
(202) 514-5621  
Counsel for Plaintiff United States

Dated: December 6, 1999