UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, *et al.*, *Plaintiffs*, v. TICKETMASTER ENTERTAINMENT, INC. and LIVE NATION, INC., *Defendants.*	Case: 1:10-cv-00139 Assigned To: Collyer, Rosemary M. Assign. Date: 1/25/2010 Description: Antitrust

CONSENT MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

The United States respectfully requests that the Court grant plaintiffs leave to file the Amended Complaint attached hereto as Exhibit A. Plaintiffs, United States of America, and the States of Arizona, Arkansas, California, Florida, Illinois, Iowa, Louisiana, Nebraska, Nevada, Ohio, Oregon, Rhode Island, Tennessee, Texas, and Wisconsin, and the Commonwealths of Massachusetts and Pennsylvania filed their Complaint, a Hold Separate Stipulation and Order ("Hold Separate"), and other documents on January 25, 2010. That same day, the Court signed and entered the Hold Separate. Since those papers were filed, New Jersey and Washington have asked to join this matter as plaintiffs. The United States has met and conferred with all of the states and defendants, and all parties consent to this motion.

While the United States understands that plaintiffs could amend the complaint to add additional plaintiffs as a matter of course under Federal Rule of Civil Procedure 15(a)(1), the United States brings this unopposed motion to ensure that the amendment and its consequences

are clear to the Court and the public. Specifically, the only difference between the original Complaint and the Amended Complaint is that New Jersey and Washington have joined as plaintiffs. This amendment does not change the status of this matter; the new states have agreed to the settlement, as shown by the Stipulation attached hereto as Exhibit B. Therefore, the United States respectfully requests that the Court grant plaintiffs leave to file the Amended Complaint attached hereto. A proposed order granting this motion is attached as Exhibit C.

Dated: January 28, 2010

Respectfully submitted,

/s/

Aaron D. Hoag
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CERTIFICATE OF SERVICE

I, Aaron Hoag, hereby certify that on January 28, 2010, I caused a copy of the Consent Motion for Leave to File Amended Complaint and attached Exhibits to be served on defendants Ticketmaster Entertainment, Inc., and Live Nation, Inc., and the plaintiff States of Arizona, Arkansas, California, Florida, Illinois, Iowa, Louisiana, Nebraska, Nevada, Ohio, Oregon, Rhode Island, Tennessee, Texas, Wisconsin, New Jersey, and Washington, and Commonwealths of Massachusetts, and Pennsylvania by mailing the documents via email to the duly authorized legal representatives of the parties, as follows:

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