

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

UNITED STATES OF AMERICA et al.,

Plaintiffs,

v.

AT&T INC., T-MOBILE USA, INC.,
and DEUTSCHE TELEKOM AG,

Defendants.

Civil Action No. 11-01560 (ESH)

**NOTICE OF PROPOSED STIPULATED
SCHEDULING AND CASE-MANAGEMENT ORDER**

Plaintiff United States on behalf of Plaintiffs and Defendants respectfully requests the Court, pursuant to Fed. R. Civ. P. 16(b) and LCvR 16.4, to enter the attached Stipulated Scheduling and Case-Management Order and resolve the parties' disputes about the dates in paragraph 11.

Plaintiff States do not object. Pursuant to LCvR 7(m), counsel for the parties have conferred and reached agreement on the language, but cannot reach agreement on the highlighted dates just in paragraph 11. As highlighted in the proposed Order, the United States' proposed date appears and then the Defendants' proposed date (i.e., [United States/Defendants]).

Dated this 23rd day of September 2011.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

/s/ Matthew C. Hammond
Matthew C. Hammond
Attorneys
U.S. Department of Justice, Antitrust Division
Telecommunications & Media
Enforcement Section
450 Fifth Street, N.W., Suite 7000
Washington, DC 20530
Phone: (202) 514-5621
Facsimile: (202) 514-6381
matthew.hammond@usdoj.gov