

**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)

Referred to Special Master Levie

**PLAINTIFFS' SECOND MOTION SEEKING RELIEF
TO FACILITATE EFFICIENT TRIAL PREPARATION**

Plaintiffs respectfully move for entry of the attached proposed Order, which addresses four issues: (1) deposition protocol; (2) the exchange of exhibit lists and a schedule for resolving admissibility and confidentiality objections; (3) the technology tutorial; and (4) pretrial legal briefs. Pursuant to LCvR 7(m), counsel for the parties have conferred and cannot reach agreement on these issues.

Dated: November 23, 2011

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Matthew C. Hammond, hereby certify that on November 23, 2011, I caused a true and correct copy of the foregoing Plaintiffs' Second Motion Seeking Relief to Facilitate Efficient Trial Preparation, Memorandum in Support, and Proposed Order to be served via electronic mail on:

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