

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

UNITED STATES OF AMERICA *et al.*,

*Plaintiffs,*

v.

DEUTSCHE TELEKOM AG, *et al.*,

*Defendants.*

Civil Action No. 1:19-cv-02232-TJK

**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. Plaintiffs, the United States of America and the States of Kansas, Nebraska, Ohio, Oklahoma, and South Dakota, filed their Complaint, a Stipulation and Order, and other documents on July 26, 2019. On July 29, 2019, the Court signed and entered the Stipulation and Order. Since those papers were filed, the State of Louisiana has asked to join this matter as a plaintiff. The United States has met and conferred with the plaintiff states and defendants in this matter, 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 Louisiana has joined as a plaintiff. This amendment does not change the status of this matter; Louisiana has agreed to the settlement, as

shown by the Stipulation attached hereto. 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.

Dated: August 15, 2019

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2019 I caused a copy of the foregoing Consent Motion for Leave to File Amended Complaint, along with the Amended Complaint, Stipulation and Proposed Order attached thereto, to be served by ECF on all counsel who have appeared in this matter and by electronic mail on:

**Counsel for Plaintiff State of Louisiana:**

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/s/ Frederick S. Young  
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