



Filed and Attested by
PROTHONOTARY
16 JUL 2015 04:17 pm
P. MARTIN

EXHIBIT "B"

THOMAS JEGLUM

vs.

AT&T, INC., AT&T MOBILITY LLC
(F/K/A CINGULAR WIRELESS), B+T
GROUP (A/K/A BTE MANAGEMENT
GROUP, LLC), B+T ENGINEERING, INC.,
AND CALVARY TEMPLE OF
ALLENTOWN

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

NO. 150601527

AFFIDAVIT OF STEVEN THRELKELD

1, STEVEN THRELKELD, upon being duly sworn according to law, depose and state as follows:

1. I am over eighteen (18) years of age. I am in all respects competent to swear to the statements in this Affidavit. I have personal knowledge of each of the facts and statements made in this Affidavit, or of those facts as they appear in the business records of AT&T Inc. and made in the regular course of AT&T Inc.'s business by persons with knowledge. I routinely rely upon such records in the usual course of my business.

2. I am an Assistant Vice President in the Finance-Accounting Department of AT&T Services, Inc. I have held this position since March 2014, and I have been employed by AT&T Services, Inc. or one of its affiliates since 1984. My job duties include serving as the Controller for AT&T Inc. Because of my position and experience, I am personally familiar with the corporate structure of AT&T Inc.

3. AT&T Inc. does not consent to jurisdiction in the Commonwealth of Pennsylvania.

4. AT&T Inc. does not regularly or systematically conduct business in the Commonwealth of Pennsylvania or City of Philadelphia.

5. AT&T Inc. was incorporated in Delaware in October 1983 under the name Southwestern Bell Corporation. Since then, it has changed its name twice. In 1995, it changed its name to SBC Communications Inc. ("SBC"). Then, after the 2005 acquisition of AT&T Corp., a New York corporation, SBC Communications Inc. changed its name to AT&T Inc. The acquired company, AT&T Corp., became a subsidiary of AT&T Inc. Throughout, AT&T Inc. has remained a Delaware corporation.

6. AT&T Inc. is and always has been a holding company. It was created as one of seven regional holding companies that were divested on January 1, 1984, by the American Telephone and Telegraph Company as part of the settlement of *United States v. Western Electric Company, Inc.*, Civil Action No. 82-0192 (D.D.C).

7. AT&T Inc. is the indirect parent corporation of several operating companies that provide telecommunication and other services under various AT&T trade names.

8. AT&T Inc. is the indirect parent corporation of AT&T Mobility LLC, a Delaware limited liability company.

9. AT&T Inc. is a legally and factually separate corporate entity, distinct from its subsidiaries, including AT&T Mobility LLC. AT&T Inc. has its own board of directors and officers and maintains its own independent corporate structure. Each of AT&T Inc.'s subsidiaries maintains its own independent corporation, partnership, or limited liability company status, identity, and structure.

10. As a holding company, AT&T Inc. does not provide or offer products or services. AT&T Inc. does not own or maintain a telecommunications network, and AT&T Inc. does not provide telecommunications services, internet services, or services

of any kind to the public. AT&T Inc. owns the stock of its corporate subsidiaries, but AT&T Inc. itself does not own the equipment and facilities that make up a telecommunications network.

11. The AT&T brand and logo are owned and licensed by AT&T Intellectual Property, Inc. (f/k/a AT&T Knowledge Ventures, L.P.), a subsidiary of AT&T Inc. Use of the AT&T brand and logo is shared by multiple companies offering different products and services and serving different geographic territories. AT&T Intellectual Property, Inc. charges AT&T operating companies a licensing fee for the “doing business as” use of the AT&T name, AT&T logo, and AT&T website in its marketing efforts. Use of the AT&T brand, logo, trademarks, and service marks by these operating companies does not signify that products and services are being offered or provided by AT&T Inc., a holding company, or AT&T Intellectual Property, Inc., the licensor.

12. The AT&T logos found on office buildings, network or other facilities in Pennsylvania is attributable to operating companies using their “doing business as” name and using the AT&T logos pursuant to their licensing agreements. Those logos, however, do not signify that the premises are owned or operated by AT&T Inc., a holding company.

13. The AT&T brand appears through national advertising, the www.att.com website, and other marketing activities, but any such activities are undertaken by AT&T Inc. subsidiaries. For example, the www.att.com website is maintained and administered by AT&T Intellectual Property, Inc. and AT&T Services, Inc., both of which are subsidiaries of AT&T Inc. The website www.att.com is an online sales channel that markets the goods and services of AT&T Inc.’s subsidiaries. The appearance of the

AT&T brand name or logo on the website does not signify that products or services are being offered or provided by AT&T Inc., a holding company, or AT&T Intellectual Property, Inc., the licensor, or AT&T Services, Inc., the website administrator.

14. AT&T Inc. is currently headquartered in Dallas, Texas, which is its only place of business.

15. AT&T Inc. does not have any employees, sales representatives, or distributors, and produces nothing to sell or distribute in the Commonwealth of Pennsylvania or elsewhere.

16. AT&T Inc. has officers and a board of directors, but AT&T Inc. has no employees in Pennsylvania or elsewhere.

17. AT&T Inc. has no presence in Pennsylvania. It has no office or mailing address in Pennsylvania, and does not own, lease, manage, or maintain any real property, office, residence, or place of business in Pennsylvania.

18. AT&T Inc. does not pay income, property, or franchise taxes to the Commonwealth of Pennsylvania.

19. AT&T Inc. is not an insurance company, and it has not insured any person, property, or risk located in Pennsylvania.

20. AT&T Inc. has never been registered, licensed, or otherwise qualified to do business in Pennsylvania and has not appointed a registered agent for service of process in Pennsylvania.

21. AT&T Inc. does not manufacture any products, and it does not offer or provide any service of any nature, including third-party billing services.

I declare under penalty of perjury that the foregoing is true and correct.

Steven Threlkeld
STEVEN THRELKELD

Executed this 13th day of July, 2015, at Dallas, Texas

SWORN TO AND SUBSCRIBED in my presence this 13th day of July, 2015.



DeeDee Bailey
Notary