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27 UNITED STATES DISTRICT COURT  
28 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

22 FEDERAL TRADE COMMISSION,

23 Plaintiff,

24 v.

25 AT&T MOBILITY LLC, a limited liability  
26 company,

27 Defendant.

Case No. 14-cv-04785-EMC

**DECLARATION OF EVAN ROSE IN  
SUPPORT OF STIPULATED REQUEST  
FOR FURTHER STAY OF DISCOVERY**

1 I, Evan Rose, declare as follows:

2 1. I am an attorney of record for Plaintiff Federal Trade Commission (“FTC”) in the  
3 above-captioned action. Pursuant to Civ. L.R. 6-2, I submit this declaration in support of the  
4 Stipulated Request for Further Stay of Discovery filed by the FTC and Defendant AT&T  
5 Mobility LLC (“AT&T”) (collectively, the “Parties”).

6 2. The parties have now finalized the redress administration provisions and secured  
7 AT&T’s final approval of the settlement agreement.

8 3. The parties are requesting a 90-day stay, through November 21, to provide the  
9 FTC’s Commissioners with an opportunity to review and vote on the proposed settlement.

10 4. The parties will notify the Court once the FTC’s Commissioners have voted on  
11 the proposed settlement.

12 5. The Court has previously issued the following orders granting stipulated requests  
13 to change time:

- 14 • Request to extend the deadlines to file the motion to dismiss and the opposition  
15 and reply thereto (Dkt. #26);
- 16 • Request to extend the deadline to file AT&T’s answer (Dkt. #58);
- 17 • Request to extend the deadline to file a joint proposal for phased discovery  
18 (Dkt. #103);
- 19 • Requests to postpone the CMC, primarily in connection with appellate review in  
20 this matter (Dkt. #117, 119, 121, 123, 127, 130, 133, 138, 161);
- 21 • Request to stay all deadlines in this case in connection with the lapse in  
22 appropriated funding for the FTC (Dkt. #164); and
- 23 • Request to stay discovery to finalize settlement provisions related to the  
24 administration of consumer redress and secure final approval of the settlement  
25 agreement from AT&T (Dkt. #181).
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I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Francisco, California on August 23, 2019.

\_\_\_\_\_/s/ Evan Rose\_\_\_\_\_  
Evan Rose