## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America,  Plaintiff,	) Civil Action No.: 1:05CV02102 (EGS)
v. SBC Communications, Inc. and AT&T Corp., Defendants.	) ) ) ) ) ) ) ) (Civil Action No.: 1:05CV02103 (EGS) ) ) ) ) ) ) ) )
United States of America,  Plaintiff,  V.	
Verizon Communications Inc. and MCI, Inc.,  Defendants.	

## UNITED STATES' UNOPPOSED MOTION FOR LEAVE TO FILE REPLY MEMORANDUM OF THIRTY-FIVE PAGES

The United States respectfully requests that the Court allow it to file its Reply to ACTel's Opposition to the United States' Motion for Entry of the Final Judgments. The proposed Reply consists of thirty-five pages, which exceeds the twenty-five page limit for reply memoranda set forth in Local Rule 7(e) of this Court.

The United States' proposed Reply addresses two separate memoranda filed by ACTel:

(1) the Memorandum of Points and Authorities in Support of ACTel's Motion for *Amicus Curiae* 

and Intervenor Status Pursuant to the Tunney Act and in Opposition to the United States' Motion for Entry of Final Judgments, filed May 5, 2006; and (2) ACTel's Supplemental Memorandum in Opposition to the United States' Motion for Entry of Final Judgments, filed May 16, 2006.

Though the United States previously responded to ACTel's Motion for *Amicus Curiae* and Intervenor Status on May 15, 2006, its Response did not address the substance of ACTel's opposition to the United States' Motion for Entry of Final Judgments, because ACTel had yet to file its supplemental memorandum in accordance with this Court's minute order of May 10, 2006. The United States now proposes to file a single thirty-five page Reply that will address the substance of both of ACTel's memoranda, rather than to file separate responses for each of them. Accordingly, the United States submits that its proposed Reply, while in excess of the page limits set forth in Local Rule 7(e), is not excessively lengthy.

<sup>&</sup>lt;sup>1</sup>See Resp. of the United States to ACTel's Motion for *Amicus Curiae* and Intervenor Status Pursuant to the Tunney Act, at 2 n.2.

Pursuant to the requirement of Local Rule 7(m), the United States represents that it has conferred with counsel for ACTel, AT&T, and Verizon, and that none of them oppose the granting of this motion.

Respectfully submitted,

s/

Laury E. Bobbish Assistant Chief

/s/

Claude F. Scott, Jr. (D.C. Bar No. 414906) Lawrence M. Frankel (D.C. Bar No. 441532) Jared A. Hughes Trial Attorneys

Telecom & Media Section Antitrust Division U.S. Department of Justice 1401 H Street, N.W., Suite 8000 Washington, D.C. 20530 (202) 514-5621 Attorneys for the United States