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13 AT&T CORP. and AT&T INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17
18 TASH HEPTING, GREGORY HICKS,
CAROLYN JEWEL and ERIK KNUTZEN
19 on Behalf of Themselves and All Others Simi-
larly Situated,

20 Plaintiffs,

21 vs.

22 AT&T CORP., AT&T INC. and DOES 1-20,
23 inclusive,

24 Defendants.

No. C-06-0672-VRW

**REPLY DECLARATION OF
STARLENE MEYERKORD IN
SUPPORT OF MOTION OF
DEFENDANT AT&T INC. TO
DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

Date: June 23, 2006
Time: 9:30 a.m.
Courtroom: 6, 17th Floor
Judge: Hon. Vaughn R. Walker

- Filed concurrently:
1. AT&T Inc.'s Reply in Support of Motion to Dismiss
 2. Reply Decl. of Joseph Tocco
 3. Request for Judicial Notice

1 I, **STARLENE MEYERKORD**, declare as follows:

2 1. My job title is Director, Office of the Senior Vice President and Secretary of
3 AT&T Inc. I make this declaration in support of the motion of defendant **AT&T INC.** to
4 dismiss plaintiffs' Amended Complaint for lack of jurisdiction. The facts stated herein are
5 based upon my own personal knowledge, review of corporate business records of AT&T
6 Inc., interviews with appropriately knowledgeable persons, or, where so indicated, upon my
7 information and belief. If called as a witness, I could and would competently testify
8 thereto.

9 2. I have reviewed a copy of Plaintiffs' Opposition to Defendant AT&T Inc.'s
10 Motion to Dismiss Amended Complaint, which contains errors of fact regarding AT&T Inc.

11 3. AT&T Inc. does not provide telecommunications services, Internet services,
12 or services of any kind to the public. Such services are provided by subsidiaries of AT&T
13 Inc.

14 4. AT&T Inc. does not own or maintain a telecommunications network.

15 5. Neither AT&T Inc., nor its predecessor SBC Communications Inc., have
16 ever owned, leased, operated or managed a building in the State of California.

17 I declare under penalty of perjury under the laws of the United States of America
18 and the State of California that the foregoing is true and correct.

19 Executed this 14 day of June, 2006, at San Antonio, Texas.

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22 Starlene Meyerkord
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