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11 *Attorneys for Defendants*  
AT&T SERVICES INC. and AT&T MOBILITY,  
12 LLC

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

16 KATHERINE SCOTT, CAROLYN JEWEL, and  
17 GEORGE PONTIS, individually and on behalf of  
all others similarly situated,

18 Plaintiffs,

19 vs.

20 AT&T INC.; AT&T SERVICES, INC.; AT&T  
21 MOBILITY, LLC; TECHNOCOM CORP.; and  
ZUMIGO, INC.,

22 Defendants.  
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Case No. 19-cv-4063-SK

DECLARATION OF GREG HILL IN  
SUPPORT OF DEFENDANTS' MOTION TO  
DISMISS

1 I, Greg Hill, declare as follow:

2 1. The following facts are of my own personal knowledge, and if called as a witness I could  
3 and would testify competently as to their truth. I submit this declaration in support of Defendants'  
4 AT&T Services, Inc. and AT&T Mobility, LLC's motion to dismiss.

5 2. I am employed by AT&T Services, Inc. as Assistant Vice President of AT&T  
6 Cybersecurity. By virtue of this role, I am familiar with the method and manner in which AT&T  
7 Services, Inc. and AT&T Mobility, LLC (collectively "AT&T") use and shared AT&T's customers'  
8 geolocation information with data aggregators.

9 3. As of March 29, 2019, AT&T stopped providing its customers' geolocation  
10 information to data aggregators. Since March 29, 2019, AT&T has not provided any of its customers'  
11 geolocation data to aggregators.

12 4. On May 15, 2019, AT&T wrote a letter to the Honorable Jessica Rosenworcel at the  
13 Federal Communications Commission, stating that as of March 29, 2019, AT&T stopped providing  
14 geolocation information to data aggregators. That letter is attached as Exhibit 1.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
16 and correct.

17 Executed on this 27th day of November 2019.

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Greg Hill