

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

IRON MOUNTAIN INC.,

and

RECALL HOLDINGS LTD.,

Defendants.

Civil Action No. 1:16-cv-00595-APM

Judge Amit P. Mehta

**DESCRIPTION OF WRITTEN OR ORAL COMMUNICATIONS
CONCERNING THE PROPOSED FINAL JUDGMENT IN THIS ACTION
AND CERTIFICATION OF COMPLIANCE UNDER 15 U.S.C. § 16(G) BY
IRON MOUNTAIN INCORPORATED**

Under Section 2(g) of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(g), defendant Iron Mountain Incorporated (“Iron Mountain”), by its attorney, submits this description of all written or oral communications by or on behalf of Iron Mountain with any officer or employee of the United States concerning the proposed Final Judgment filed in this action on March 31, 2016. In accordance with Section 2(g), this description excludes any communications “made by counsel of record alone with the Attorney General or the employees of the Department of Justice alone.” 15 U.S.C. § 16(g).

To the best of Iron Mountain’s knowledge, after appropriate inquiry, there have been no written or oral communications by or on behalf of Iron Mountain with any officer or employee of the United States concerning the proposed Final Judgment, except for communications between counsel of record for Iron Mountain and employees of the Department of Justice

Antitrust Division. Iron Mountain therefore certifies that the requirements of Section 2(g) have been complied with and that this description of communications by or on behalf of Iron Mountain and required to be reported under Section 2(g) is true and complete.

Dated: April 8, 2016

/s/ Laura A. Wilkinson

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*Counsel for Defendant
Iron Mountain Incorporated*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April, 2016, the foregoing Description of Written or Oral Communications Concerning the Proposed Final Judgement in this Action and Certification of Compliance under 15 U.S.C. § 16(g) by Iron Mountain Incorporated was filed using the Court's CM/ECF system, which shall send notice to all counsel of record.

/s/ Laura A. Wilkinson
Laura A. Wilkinson, Esq.

*Counsel for Defendant
Iron Mountain Incorporated*