

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

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 1:20-cv-03010-APM

HON. AMIT P. MEHTA

**JOINT STIPULATION AND ORDER REGARDING PLAINTIFFS' MOTION TO  
COMPEL PRODUCTION OF DOCUMENTS AND DATA CITED IN EXPERT  
REPORTS OF EDWARD A. FOX AND MARK A. ISRAEL**

The parties have conferred regarding Plaintiffs' Motion to Compel Production of Documents and Data Cited in Expert Reports of Edward A. Fox and Mark A. Israel (ECF No. 376) and, subject to the approval of the Court, hereby stipulate and agree to resolution of Plaintiffs' Motion to Compel relating to the expert report of Edward A. Fox as follows:

1. Edward A. Fox shall withdraw any mention of the European data reduction experiments from his expert report(s);
2. At trial, provided Plaintiffs' experts do not mention or discuss the European data reduction experiments on direct examination or the Plaintiffs do not raise these experiments on cross examination, Edward A. Fox will not mention or discuss the European experiments and he will not rely upon those experiments in any way to support his conclusions;
3. United States Plaintiffs may question Prabhakar Raghavan regarding the European data reduction experiments; such questioning will not alter the duration of Mr. Raghavan's deposition; and this deposition will take place on October 28, 2022 at 9:30 am PT;

4. United States Plaintiffs will not seek any additional questioning of other fact witnesses on the topic of European data reduction experiments; however, United States Plaintiffs may ask about the European data reduction experiments in the deposition of Edward A. Fox.

Nothing in this Order limits any party's scope of cross examination on any witness at trial.

SO ORDERED:

Dated: August \_\_\_\_, 2022

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Hon. Amit P. Mehta  
United States District Court