

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

State of Colorado, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

Case No. 1:20-cv-03715-APM

HON. AMIT P. MEHTA

**DEFENDANT GOOGLE LLC’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Civil Rule 7(h) of the Local Rules of the United States District Court for the District of Columbia, Defendant Google LLC respectfully moves the Court for summary judgment against the plaintiffs in *State of Colorado, et al. v. Google LLC*, No. 20-cv-3715-APM (the “Colorado Action”).

This Motion addresses the claims and allegations that are unique to the Colorado Action and were not asserted by the plaintiffs in *United States, et al. v. Google LLC*, No. 20-cv-3010-APM (the “DOJ Action”). Google has separately moved for summary judgment against the plaintiffs in the DOJ Action. *See* ECF No. 421 in Case No. 20-cv-3010-APM. That motion for summary judgment also applies to the Colorado Action to extent that it “incorporate[s] by reference” any of the claims or allegations made in the DOJ Action. Colo. Pls.’ Compl. ¶ 58 (ECF No. 1-2 in Case No. 20-cv-3715-APM).

Google’s Motion is supported by the concurrently filed Memorandum of Points and Authorities in Support of Its Motion for Summary Judgment, the Statement of Material Facts as to Which There Is No Genuine Issue in Support of Its Motion for Summary Judgment, and the accompanying exhibits.

Dated: December 12, 2022

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ John E. Schmidlein  
John E. Schmidlein (D.C. Bar No. 441261)  
Benjamin M. Greenblum (D.C. Bar No. 979786)  
Colette T. Connor (D.C. Bar No. 991533)  
680 Maine Avenue, SW  
Washington, DC 20024  
Tel: 202-434-5000  
jschmidlein@wc.com  
bgreenblum@wc.com  
cconnor@wc.com

WILSON SONSINI GOODRICH & ROSATI P.C.  
Susan A. Creighton (D.C. Bar No. 978486)  
Franklin M. Rubinstein (D.C. Bar No. 476674)  
Wendy Huang Waszmer (D.C. Bar No. 1631078)  
1700 K Street, NW  
Washington, DC 20006  
Tel: 202-973-8800  
screighton@wsgr.com  
frubinstein@wsgr.com  
wwaszmer@wsgr.com

ROPES & GRAY LLP  
Mark S. Popofsky (D.C. Bar No. 454213)  
2099 Pennsylvania Avenue, NW  
Washington, DC 20006  
Tel: 202-508-4624  
Mark.Popofsky@ropesgray.com

*Counsel for Defendant Google LLC*