

**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

**PARTIES' JOINT STATUS REPORT ON PROTECTIVE ORDER
AND DEFENDANT'S NOTICE REGARDING RULE 12 MOTION**

Pursuant to the Court's October 30, 2020 Minute Order, the Parties submit this Joint Status Report updating the Court on the status of negotiations regarding a proposed Protective Order and Defendant's intention with respect to whether it will file a Rule 12(b) motion.

1. **Protective Order.** The Parties have exchanged initial proposals regarding the terms of a proposed Protective Order governing the exchange and submission of confidential material, but have been unable to agree on a single proposed order. Although the Parties have reached agreement on many terms and provisions, a small number of significant issues remain in dispute. The Parties propose to submit short position statements to the Court outlining their respective positions on the disputed terms, not to exceed ten (10) pages, by November 13, 2020. The Parties will be prepared to discuss their positions at the Status Conference scheduled for November 18, 2020. The Plaintiffs also understand that third parties would like to be heard on this issue, and the Parties therefore request that they be allowed to submit short position statements to the Court outlining their respective positions on the disputed terms, not to exceed seven (7) pages, by November 13, 2020.

2. **Google's Intention with respect to Rule 12 Motion.** Google informs the Court that it does not intend to file a Rule 12(b) motion to dismiss, and will answer the Complaint on or before December 21, 2020.

Dated: November 6, 2020

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ John E. Schmidlein
John E. Schmidlein
Benjamin M. Greenblum
725 12th Street, NW
Washington, DC 20005
Tel: 202-434-5000
jschmidlein@wc.com
bgreenblum@wc.com

WILSON SONSINI GOODRICH & ROSATI P.C.

By: /s/ Franklin M. Rubinstein
Franklin M. Rubinstein
1700 K St, NW
Washington, DC 20006
Tel: 202-973-8833
frubinstein@wsgr.com

ROPES & GRAY LLP

By: /s/ Mark S. Popofsky
Mark S. Popofsky
2099 Pennsylvania Avenue, NW
Washington, DC 20006
Tel: 202-508-4624
Mark.Popofsky@ropesgray.com

Counsel for Defendant Google LLC

Dated: November 6, 2020

By: /s/ Kenneth M. Dintzer
Kenneth M. Dintzer
U.S. Department of Justice, Antitrust Division

Technology & Financial Services Section
450 Fifth Street NW, Suite 7100
Washington, DC 20530
Kenneth.Dintzer2@usdoj.gov

Counsel for Plaintiff United States

By: /s/ Leslie Rutledge
Leslie Rutledge, Attorney General
Johnathan R. Carter, Assistant Attorney General
Office of the Attorney General, State of Arkansas
323 Center Street, Suite 200
Little Rock, Arkansas 72201
Johnathan.Carter@arkansasag.gov

Counsel for Plaintiff State of Arkansas

By: /s/ Ashley Moody
Ashley Moody, Attorney General
R. Scott Palmer, Interim Co-Director, Antitrust
Division
Nicholas D. Niemiec, Assistant Attorney General
Lee Istrail, Assistant Attorney General
Office of the Attorney General, State of Florida
PL-01 The Capitol
Tallahassee, Florida 32399
Scott.Palmer@myfloridalegal.com

Counsel for Plaintiff State of Florida

By: /s/ Christopher Carr
Christopher Carr, Attorney General
Margaret Eckrote, Deputy Attorney General
Daniel Walsh, Senior Assistant Attorney General
Dale Margolin Cecka, Assistant Attorney General
Office of the Attorney General, State of Georgia
40 Capitol Square, SW
Atlanta, Georgia 30334-1300
dcecka@law.georgia.gov

Counsel for Plaintiff State of Georgia

By: /s/ Curtis Hill
Curtis Hill, Attorney General
Scott L. Barnhart, Chief Counsel and Director,
Consumer Protection Division

Matthew Michaloski, Deputy Attorney General
Erica Sullivan, Deputy Attorney General
Office of the Attorney General, State of Indiana
Indiana Government Center South, Fifth Floor
302 West Washington Street
Indianapolis, Indiana 46204
Scott.Barnhart@atg.in.gov

Counsel for Plaintiff State of Indiana

By: /s/ Daniel Cameron
Daniel Cameron, Attorney General
Justin D. Clark, Deputy Director of Consumer
Protection
J. Christian Lewis, Executive Director of
Consumer Protection
Philip R. Heleringer, Assistant Attorney General
Jonathan E. Farmer, Assistant Attorney General
Office of the Attorney General, Commonwealth of
Kentucky
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601
Justind.Clark@ky.gov

Counsel for Plaintiff Commonwealth of Kentucky

By: /s/ Jeff Landry
Jeff Landry, Attorney General
Stacie L. Deblieux, Assistant Attorney General
Office of the Attorney General, State of Louisiana
Public Protection Division
1885 North Third St.
Baton Rouge, Louisiana 70802
Deblieuxs@ag.louisiana.gov

Counsel for Plaintiff State of Louisiana

By: /s/ Kimberley G. Biagioli
Kimberley G. Biagioli
Assistant Attorney General
Missouri Attorney General's Office
615 E. 13th Street, Suite 401
Kansas City, MO 64106
Kimberley.Biagioli@ago.mo.gov

Counsel for Plaintiff State of Missouri

By: /s/ Lynn Fitch

Lynn Fitch, Attorney General
Hart Martin, Special Assistant Attorney General
Crystal Utley Secoy, Assistant Attorney General
Office of the Attorney General, State of
Mississippi
P.O. Box 220
Jackson, Mississippi 39205
Hart.Martin@ago.ms.gov

Counsel for Plaintiff State of Mississippi

By: /s/ Timothy C. Fox

Timothy C. Fox, Attorney General
Mark Mattioli, Chief, Office of Consumer
Protection
Office of the Attorney General, State of Montana
P.O. Box 200151
555 Fuller Avenue, 2nd Floor
Helena, MT 59620-0151
mmattioli@mt.gov

Counsel for Plaintiff State of Montana

By: /s/ Alan Wilson

Alan Wilson, Attorney General
Rebecca M. Hartner, Assistant Attorney General
W. Jeffrey Young, Chief Deputy Attorney General
C. Havird Jones, Jr., Senior Assistant Deputy
Attorney General
Mary Frances Jowers, Assistant Deputy Attorney
General
Office of the Attorney General, State of South
Carolina
1000 Assembly Street
Rembert C. Dennis Building
P.O. Box 11549
Columbia, South Carolina 29211-1549
RHartner@scag.gov

Counsel for Plaintiff State of South Carolina

By: /s/ Bret Fulkerson

Bret Fulkerson

Office of the Attorney General, Antitrust Division

300 West 15th Street

Austin, Texas 78701

Bret.Fulkerson@oag.texas.gov

Counsel for Plaintiff State of Texas