

**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

State of Colorado, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

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

HON. AMIT P. MEHTA

**JOINT STATUS REPORT REGARDING  
SCHEDULE FOR REMEDY PROCEEDINGS**

Pursuant to the Court's Order following the September 6, 2024 Status Conference, the Parties submit the following Joint Status Report regarding a proposed schedule for proceedings regarding remedies.

### **I. Status**

On September 11, 2024, the Parties met to discuss the schedule for the remedy proceedings and related discovery in these cases. The Parties have not been able to reach an agreement and, as such, submit their respective position statements and proposed schedules for the Court's consideration.

The Parties' scheduling proposals are included in the chart below:

<b>Event</b>	<b>Plaintiffs' Proposal</b>	<b>Google's Proposal</b>
Fact discovery begins	September 26, 2024	September 26, 2024
Plaintiffs provide high-level framework of potential remedies	October 15, 2024	September 26, 2024
Google provides potential remedies it may propose that are not included in Plaintiffs' framework	October 22, 2024	N/A
Plaintiffs' Proposed Final Judgment and Initial Witness List	December 16, 2024	November 8, 2024
Defendant's Proposed Final Judgment and Initial Witness List	January 17, 2025	December 9, 2024
Fact discovery closes	March 7, 2025	February 14, 2025
Parties exchange Revised Proposed Final Judgments	March 14, 2025	February 17, 2025
Parties exchange expert reports/declarations	March 21, 2025	February 24, 2025
Parties exchange responsive expert reports/declarations	April 11, 2025	March 24, 2025
Expert discovery closes	April 25, 2025	April 4, 2025
Evidentiary hearing	April 28, 2025 (1-2 weeks)	April 14, 2025 (Length TBD)
Post-hearing briefs	1 week following conclusion of evidentiary hearing	May 23, 2025

## II. DOJ And Colorado Plaintiffs' Position Statement

Plaintiffs' and Google's proposed schedules differ in three aspects:

*First*, Plaintiffs have provided a schedule consistent with the Court and Parties' discussion at the September 6 status conference. In particular, Plaintiffs took seriously the Court's guidance that the schedule include "some general framework...of high-level potential remedies early" that would help "kickstart things," while emphasizing to Plaintiffs that "you've got to give [Google] something more detailed, at a minimum, by year end[.]" Hr'g Tr. at 30 (Sept. 6, 2024). Plaintiffs' proposed schedule satisfies those requirements.

Notwithstanding the Court's instruction and guidance, and even though the Court bifurcated liability and damages such that remedies discovery has not yet occurred, Google seeks to require Plaintiffs to submit a Proposed Final Judgment significantly earlier. This misses the purpose of this bifurcated remedy phase, which aims to develop the facts necessary to propose an appropriate remedy in technical and complex markets that Google has illegally monopolized for over a decade. In any event, Google certainly has insight into its own discovery on remedies, which—coupled with the receipt of Plaintiffs' high-level framework on October 15, 2024—will provide Google ample insight into possible remedies and the scope of discovery.

*Second*, Google seeks additional time at three stages: to prepare responsive expert reports, to plan for the evidentiary hearing, and to draft post-hearing briefs. Plaintiffs do not believe the additional time Google seeks at each stage is necessary and believe it will needlessly impact the time requested by the Court to issue a ruling.

*Third*, Plaintiffs propose that, on October 22, 2024, Google provide a high-level framework of potential remedies in the event that Google is considering remedies that are not identified in Plaintiffs' high-level framework. This information will help Plaintiffs understand whether the scope of discovery is larger than what they have referenced in their high-level

framework and will, therefore, facilitate the discovery process and help ensure that the Parties are working through discovery with an understanding of the possible remedies being considered and explored.

Plaintiffs respectfully request that the Court enter an order adopting Plaintiffs' proposed schedule, as reflected above.

### **III. Google's Position Statement**

Adhering to the Court's guidance that taking a "combination" approach – i.e., Plaintiffs providing a remedies framework followed shortly by a final proposed remedies order – would be appropriate here, Google requests that Plaintiffs provide their remedies framework on September 26 at the start of discovery, followed by their proposed remedies order and witness list on November 8, 2024. Google continues to submit that this earlier phased disclosure of information is both fair and necessary for Google to meaningfully defend itself against Plaintiffs' proposed remedies. Plaintiffs' proposed remedies schedule, which delays disclosure of the framework until October 15 and the actual order until December 16, fails to adhere to the Court's guidance that Plaintiffs should provide a "general framework . . . of high-level potential remedies *early*, with something concrete *not long* after." 9/6 Hr'g Tr. 30:13-20 (emphases added).

*First*, Plaintiffs still do not intend to provide Google with their "high-level" remedies framework until October 15. At the same time, Plaintiffs propose beginning discovery on September 26 – giving themselves a three-week head start on discovery before Google has any idea what remedies Plaintiffs may seek. There is no reason for this discrepancy, and no reason for further delay. As the Court observed, Google is already at an informational disadvantage. Plaintiffs should not be permitted to capitalize on Google's disadvantage.

*Second*, Plaintiffs add a new demand that Google disclose on October 22 the potential remedies that *Google* may propose that are not otherwise captured by whatever initial framework

Plaintiffs present. Google has no obligation to present its own remedies framework, and there is no basis to require Google to identify any proposal until it receives and has time to evaluate Plaintiffs' actual, specific proposed order.

*Third*, Plaintiffs seek to delay until December 16 disclosure of their actual proposed remedies order and supporting witnesses. The Court should require Plaintiffs to provide Google with those disclosures by November 8. By that point, Plaintiffs will have had more than three months with the Court's August 5 order. Plaintiffs are already in communications with third parties; they do not require formal discovery to obtain information relevant to their assessment of remedies. In any event, the November 8 deadline allows them six weeks of formal discovery, a timeline consistent with that afforded to the government in *New York v. Microsoft* (there, discovery opened on November 2 and Plaintiffs' proposal was due December 12).

By all measures, Plaintiffs' proposed date of December 16 is far too late. As the Court recognized, Google's receipt of Plaintiffs' specific proposal "is going to be the starting bell for [Google] to know exactly what they need to do and exactly what they need to say"; until then, Google is "dealing with one arm behind their backs." 9/6 Hr'g Tr. 17:22-18:5. Under Plaintiffs' proposed schedule, given the December holidays, Google would effectively be squeezed into subpoenaing third parties, deposing witnesses, and preparing and producing its own witnesses in a two-month period. Moreover, Plaintiffs' schedule places Google's window to develop its own remedies proposal in response to Plaintiffs' proposal squarely over the December holidays.

*Finally*, Google's proposed schedule ensures that the hearing concludes and post-trial briefing is submitted in advance of June 1, 2025, consistent with the Court's instruction.

Google respectfully requests that the Court enter Google's schedule.

Dated: September 13, 2024

Respectfully submitted,

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