

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

THALES S.A. and GEMALTO N.V.,

Defendants.

Case No.: 1:19-cv-00569-BAH

UNITED STATES' UNOPPOSED MOTION TO APPOINT A MONITORING TRUSTEE

Plaintiff United States of America files this motion to appoint Julie Myers Wood, chief executive officer of the monitoring firm Guidepost Solutions LLC, as the Monitoring Trustee with the responsibilities and authority set forth in Section X of the proposed Final Judgment (ECF No. 2-1, Ex. A). The United States has informed Thales of its intent to file a motion to appoint Ms. Wood as the Monitoring Trustee, and counsel for Thales has informed the United States that it consents to her appointment.

The Court may approve this motion before making the public interest determination required by Section XVIII of the PFJ. Section IV.B of the Stipulation and Order, entered by the Court on March 5, 2019, (ECF No. 2-1 and 9), provides that, during the period while the PFJ is subject to public comment and Court review under the Antitrust Procedures and Penalties Act (15 U.S.C. §§ 16(b)-(h)) ("APPA"), defendants shall abide by and comply with the provisions of the proposed Final Judgment pending entry of the Final Judgment by the Court. That section

also provides that, during the pendency of the APPA review, the United States shall have the full rights and enforcement powers in the PFJ, as if the PFJ were in full force and effect as the final order of the Court.

Paragraph X.A of the PFJ states that: “Upon application of the United States, the Court shall appoint a Monitoring Trustee selected by the United States and approved by the Court.”

The United States has selected Julie Myers Wood to serve as the Monitoring Trustee and respectfully requests that the Court approve her selection.

Ms. Wood is highly qualified to serve as Monitoring Trustee in this matter. She has over 20 years of experience in the public and private sectors working on regulatory and enforcement issues. She has extensive experience as an independent monitor/consultant and monitoring trustee appointed by the U.S. government. She was appointed to be the Monitoring Trustee in another antitrust case recently filed by the U.S. Department of Justice in this district, *United States v. CVS Health Corporation and Aetna Inc.*, Case No. 1:18-cv-02340-RJL (ECF No. 20-3, order granted by minute entry on Dec. 3, 2018), and she was also a U.S. Department of Justice-appointed independent consultant on compliance issues for both a security company and a global energy firm. Her previous experience in the public sector includes serving as an Assistant U.S. Attorney, as Chief of Staff for the Criminal Division at the U.S. Department of Justice, and as an Assistant Secretary in the U.S. Department of Homeland Security heading up its largest investigative component.

Guidepost Solutions is also qualified to support Ms. Wood as the Monitoring Trustee, having supported monitors and independent consultants in dozens of capacities, including several appointments by the U.S. Department of Justice. Neither Ms. Wood nor Guidepost Solutions

have conflicts of interest that would disqualify them from fulfilling their role as the Monitoring Trustee in this case.

The CV of Ms. Wood is attached as Exhibit A.

Accordingly, the United States respectfully requests that Julie Myers Wood be appointed Monitoring Trustee in this matter at the Court's earliest convenience. A proposed order appointing Ms. Wood as the Monitoring Trustee is attached as Exhibit B.

Dated: June 25, 2019

Respectfully submitted,



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