

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, et al.,
Plaintiffs

v.

AMERICAN EXPRESS CO., et al.,
Defendants

No. 10-CV-04496 (NGG)

JOINT SUBMISSION AS TO REMEDY

Pursuant to the Court's Scheduling Order (Dkt. 620), counsel for the United States and State Plaintiffs (collectively "Plaintiffs") and Defendants American Express Company and American Express Travel Related Services Company, Inc. ("Defendants") jointly submit Proposed Remedial Orders and a comparison indicating where the parties are in agreement and disagreement. The parties will separately submit memoranda concerning the proposals.

Attached are three appendices containing Plaintiffs' and Defendants' proposed judgments. Appendix 1 is Plaintiffs' Proposed Judgment. Appendix 2 is Defendants' Proposed Judgment. Appendix 3 is a comparison of Plaintiffs' Proposed Judgment with Defendants' Proposed Judgment.

Dated: March 23, 2015

U.S. DEPARTMENT OF JUSTICE

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