

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

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United States of America, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

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Case No. 1:20-cv-03010-APM

HON. AMIT P. MEHTA

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State of Colorado, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

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

HON. AMIT P. MEHTA

**JOINT DISCOVERY PLAN**

Pursuant to the Court's Order, ECF No. 1043, the Parties submit the following joint discovery plan, which identifies four areas of disagreement below, consistent with the Court's instruction.

**I. Joint Discovery Plan**

1. Except as modified below, the applicable limitations and procedures from the CMO, ECF No. 108-1, continue to control.
2. **Interrogatories.** Each side is limited to 20 interrogatories, including subparts. No party shall serve any contention interrogatories.

3. **Requests for Admission.** Each side is limited to 5 requests for admission.

4. **Depositions.**

a. Limitations to the number of fact witnesses:

i. [Plaintiffs' Proposal: Each side is limited to 30 fact witnesses. Plaintiffs are limited to 20 fact witnesses of current Google employees.]

1. Plaintiffs' position: Due to the diverse set of potential remedies, there may be a number of non-overlapping issues that necessitate more depositions.

ii. [Google's Proposal: Each side is limited to 20 fact witnesses. Plaintiffs are limited to 10 fact witnesses of current Google employees.]

1. Google's position: The burden of preparation during the already-expedited schedule falls disproportionately on Google, and there is no need for 20 Google employee depositions given the extensive testimony Plaintiffs have already obtained (between the investigation, litigation, and trial).

b. Limitations to the number of 30(b)(6) depositions:

i. [Plaintiffs' Proposal: Plaintiffs are limited to two 30(b)(6) depositions.]

1. Plaintiffs believe that two 30(b)(6) depositions will ultimately avoid less efficient and burdensome discovery—we intend to issue one 30(b)(6) notice early in the discovery period to winnow the issues in which further discovery is warranted, and one 30(b)(6) notice later in the discovery period to develop key facts in anticipation of the evidentiary hearing.

ii. [Google's Proposal: Plaintiffs are limited to one 30(b)(6) deposition.]

1. Google's position: Especially in view of the other discovery

Plaintiffs contemplate, there is no legitimate need to further burden

Google through successive 30(b)(6) depositions.

c. Depositions of party fact witnesses are limited to no more than a 7-hour day.

d. During non-Party depositions noticed by only one side, the non-noticing side may cross-examine the witness for up to one hour at the conclusion of direct examination, and the side who conducted the direct examination shall be entitled to redirect examination of the witness for approximately the same amount of record time as the cross-examination regardless of whether the redirect examination extends past the 7-hour limit, but in no event shall the total on-record portion of the deposition extend past 8 hours. Even if the total, on-record portion of the deposition goes beyond 7 hours, the deposition shall conclude on the same day and shall not extend to a second day, unless the Parties all agree to have portion of the deposition take place on a second day. If a non-Party deposition is noticed by both sides, then the deposition will be 7 hours and will be divided equally between the sides, and the deposition of the non-Party will count as one deposition for each side. Any time allotted to one side not used by that side in a non-Party deposition may be used by the other side. During these remedy proceedings, no person shall object to a deposition on the basis that they were deposed during the liability proceeding in this matter.

5. **Expert Depositions.** Any expert may be deposed, after all expert reports and accompanying materials have been disclosed, for no more than 7 hours.

**6. Witness Lists.**

a. [Plaintiffs' Proposal: On the dates previously ordered by the Court, each side shall provide (i) an Initial Witness List which shall be limited to 35 persons, not including experts; (ii) and a Final Witness List, which shall be limited to 15 persons, not including experts. Parties may designate from depositions of persons not on the Final Witness List.]

i. Plaintiffs' position: Due to the diverse set of potential remedies, the remedies evidentiary hearing may consist of briefer and more targeted examinations, but of more persons, necessitating larger Initial and Final Witness Lists.

b. [Google's Proposal: On the dates previously ordered by the Court, each side shall provide (i) an Initial Witness List which shall be limited to 20 persons, including experts; (ii) and a Final Witness List, which shall be limited to 12 persons, including experts.]

i. Google's position: Plaintiffs' proposed witness numbers far exceed the number of witnesses they could possibly call at trial given their representations regarding trial length and the schedule the Court set, and as such do not provide Google with actual notice as to which witnesses they expect to call.

**7. Document Requests.** The Parties must serve any objections to requests for productions of documents within 14 days. Within 3 days of service of any objections, the Parties must meet and confer to attempt to resolve any objections and to agree on custodians to be searched.

- a. [Plaintiffs' Proposal: no proposed limitation]
    - i. Plaintiffs' position: Plaintiffs believe that, consistent with the Federal Rules, there should be no artificial limit on search strings and custodians, as it will likely be necessary to develop distinct search strings and custodians to fulfill RFPs related to the diverse set of potential different remedies under consideration.
  - b. [Google's Proposal: The Parties may serve requests for production that contemplate identifying potentially responsive documents through the application of search strings to files collected from custodians, provided that no Party shall be obligated to apply more than 10 search strings or collect files from more than 15 custodians in response to all such requests.]
    - i. Google's position: Given the expedited discovery schedule and trial length, placing reasonable limitations on the scope of searches and custodial files is necessary to ensure that Plaintiffs focus their efforts, rather than engaging in scorched-earth tactics that serve only to distract Google from preparing its defenses.
8. **Service of Pleadings and Discovery on Other Parties.** The Parties shall exchange a list of contacts for the persons to be served if service is not completed via ECF.

Dated: September 24, 2024

Respectfully submitted,

/s/ Karl E. Herrmann

Karl E. Herrmann (D.C. Bar #1022464)

David E. Dahlquist

Adam T. Severt

Travis R. Chapman

Sara T. Gray

Veronica N. Onyema (D.C. Bar #979040)  
Ryan S. Struve (D.C. Bar # 495406)

U.S. Department of Justice  
Antitrust Division  
Technology & Digital Platforms Section  
450 Fifth Street NW, Suite 7100  
Washington, DC 20530  
Telephone: (202) 307-6158  
David.Dahlquist@usdoj.gov  
Adam.Severt@usdoj.gov

*Counsel for Plaintiff  
United States of America*

By: /s/ Matthew Michaloski  
Theodore Edward Rokita, Attorney General  
Scott L. Barnhart, Chief Counsel and Director,  
Consumer Protection Division  
Matthew Michaloski, Deputy Attorney General  
Christi Foust, Deputy Attorney General  
Jesse Moore, Deputy Attorney General  
Office of the Attorney General, State of Indiana  
Indiana Government Center South, Fifth Floor  
302 West Washington Street  
Indianapolis, Indiana 46204  
Matthew.Michaloski@atg.in.gov

*Counsel for Plaintiff State of Indiana*

By: /s/ Diamante Smith

Ken Paxton, Attorney General  
Brent Webster, First Assistant Attorney General  
Ralph Molina, Deputy First Assistant Attorney General  
James Lloyd, Chief, Antitrust Division  
Trevor Young, Deputy Chief, Antitrust Division  
Diamante Smith, Assistant Attorney General  
Office of the Attorney General, State of Texas  
300 West 15th Street  
Austin, Texas 78701  
Diamante.Smith@oag.texas.gov

*Counsel for Plaintiff State of Texas*

By: /s/ Lee Istrail

Ashley Moody, Attorney General  
R. Scott Palmer, Special Counsel, Complex Enforcement Chief, Antitrust Division  
Lee Istrail, Assistant Attorney General  
Christopher A. Knight, Assistant Attorney General  
Office of the Attorney General, State of Florida  
PL-01 The Capitol  
Tallahassee, Florida 32399  
Lee.Istrail@myfloridalegal.com  
Scott.Palmer@myfloridalegal.com  
Christopher.Knight@myfloridalegal.com

*Counsel for Plaintiff State of Florida*

Matthew M. Ford  
Arkansas Bar No. 2013180  
Senior Assistant Attorney General  
Office of the Arkansas Attorney General Tim Griffin  
323 Center Street, Suite 200  
Little Rock, AR 72201  
Matthew.Ford@arkansasag.gov

*Counsel for Plaintiff State of Arkansas*

Rob Bonta, Attorney General  
Paula Blizzard, Senior Assistant Attorney General  
Brian Wang, Deputy Attorney General  
Carolyn D. Jeffries, Deputy Attorney General  
(DC Bar No. 1600843)  
Office of the Attorney General  
California Department of Justice  
455 Golden Gate Avenue, Suite 11000  
San Francisco, California 94102  
[Brian.Wang@doj.ca.gov](mailto:Brian.Wang@doj.ca.gov)

*Counsel for Plaintiff State of California*

Christopher Carr, Attorney General  
Robin Leigh, Deputy Attorney General  
Jeffrey Stump, Senior Assistant Attorney General  
Charles Thimmesch, Assistant Attorney General  
Office of the Attorney General, State of Georgia  
40 Capitol Square, SW  
Atlanta, Georgia 30334-1300  
[cthimmesch@law.georgia.gov](mailto:cthimmesch@law.georgia.gov)

*Counsel for Plaintiff State of Georgia*

Russell Coleman, Attorney General  
J. Christian Lewis, Commissioner of the Office of Consumer Protection  
Philip R. Heleringer, Executive Director of the Office of Consumer Protection  
Jonathan E. Farmer, Deputy Executive Director of the Office of Consumer Protection  
Office of the Attorney General, Commonwealth of Kentucky  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601  
[Philip.Heleringer@ky.gov](mailto:Philip.Heleringer@ky.gov)

*Counsel for Plaintiff Commonwealth of Kentucky*



Liz Murrill, Attorney General  
Patrick Voelker, Assistant Attorney General  
Office of the Attorney General, State of  
Louisiana  
Public Protection Division  
1885 North Third St.  
Baton Rouge, Louisiana 70802  
[voelkerp@ag.louisiana.gov](mailto:voelkerp@ag.louisiana.gov)

*Counsel for Plaintiff State of Louisiana*

Dana Nessel, Attorney General  
Scott Mertens, Assistant Attorney General  
Michigan Department of Attorney General  
P.O. Box 30736  
Lansing, Michigan 48909  
[MertensS@michigan.gov](mailto:MertensS@michigan.gov)

*Counsel for Plaintiff State of Michigan*

Michael Schwalbert  
Missouri Bar No. 63229  
Assistant Attorney General  
Consumer Protection Section  
Missouri Attorney General's Office  
815 Olive Street | Suite 200  
Saint Louis, Missouri 63101  
[michael.schwalbert@ago.mo.gov](mailto:michael.schwalbert@ago.mo.gov)  
Phone: 314-340-7888  
Fax: 314-340-7981

*Counsel for Plaintiff State of Missouri*

Lynn Fitch, 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*

Anna Schneider  
Bureau Chief  
Montana Office of Consumer Protection  
P.O. Box 200151  
Helena, MT. 59602-0150  
Phone: (406) 444-4500  
Fax: 406-442-1894  
Anna.schneider@mt.gov

*Counsel for Plaintiff State of Montana*

Alan Wilson, 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  
Rebecca M. Hartner, Assistant 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  
mfjowers@scag.gov

*Counsel for Plaintiff State of South Carolina*

Joshua L. Kaul, Attorney General  
Laura E. McFarlane, Assistant Attorney General  
Wisconsin Department of Justice  
17 W. Main St.  
Madison, Wisconsin 53701  
mcfarlanele@doj.state.wi.us

*Counsel for Plaintiff State of Wisconsin*

FOR PLAINTIFF STATE OF COLORADO

PHILIP WEISER  
Attorney General of Colorado

/s/ Jonathan B. Sallet

Jonathan B. Sallet, DC Bar No. 336198  
Steven M. Kaufmann, DC Bar No. 1022365  
(inactive) Elizabeth W. Hereford  
Conor J. May  
Colorado Office of the Attorney  
General  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Telephone: (720) 508-6000  
E-Mail: Jon.Sallet@coag.gov  
Steve.Kaufmann@coag.gov  
Elizabeth.Hereford@coag.gov  
Conor.May@coag.gov

William F. Cavanaugh, Jr.  
PATTERSON BELKNAP WEBB & TYLER  
LLP  
1133 Avenue of the Americas Suite 2200  
New York, NY 10036-6710  
Telephone: (212) 335-2793  
E-Mail: wfcavanaugh@pbwt.com

*Counsel for Plaintiff State of Colorado*

FOR PLAINTIFF STATE OF NEBRASKA

MIKE HILGERS  
Attorney General of Nebraska

Colin P. Snider, Assistant Attorney General  
Nebraska Department of Justice  
Office of the Attorney General  
2115 State Capitol  
Lincoln, NE 68509  
Telephone: (402) 471-3840  
E-Mail: [Colin.Snider@nebraska.gov](mailto:Colin.Snider@nebraska.gov)

William F. Cavanaugh, Jr.  
PATTERSON BELKNAP WEBB & TYLER  
LLP  
1133 Avenue of the Americas Suite 2200  
New York, NY 10036-6710  
Telephone: (212) 335-2793  
E-Mail: [wfcavanaugh@pbwt.com](mailto:wfcavanaugh@pbwt.com)

*Counsel for Plaintiff State of Nebraska*

FOR PLAINTIFF STATE OF ARIZONA

KRISTIN K. MAYES  
Attorney General of Arizona

Robert A. Bernheim, Unit Chief Counsel  
Jayme Weber, Senior Litigation Counsel  
Arizona Office of the Attorney General  
400 West Congress, Ste. S-215  
Tucson, Arizona 85701  
Telephone: (520) 628-6507  
E-Mail: [Robert.bernheim@azag.gov](mailto:Robert.bernheim@azag.gov)  
[Jayme.Weber@azag.gov](mailto:Jayme.Weber@azag.gov)

*Counsel for Plaintiff State of Arizona*

FOR PLAINTIFF STATE OF IOWA

BRENNA BIRD  
Attorney General of Iowa

Noah Goerlitz, Assistant Attorney General  
Office of the Attorney General of Iowa  
1305 E. Walnut St., 2nd Floor  
Des Moines, IA 50319  
Telephone: (515) 725-  
1018

E-Mail: Noah.goerlitz@ag.iowa.gov

*Counsel for Plaintiff State of Iowa*

FOR PLAINTIFF STATE OF NEW YORK

LETITIA JAMES

Attorney General of New York

Elinor R. Hoffmann

Morgan J. Feder

Michael D. Schwartz

Office of the Attorney General of New York

28 Liberty Street

New York, NY 10005

Telephone: (212) 416-8513

E-Mail: Elinor.hoffmann@ag.ny.gov

Morgan.feder@ag.ny.gov

Michael.schwartz@ag.ny.gov

*Counsel for Plaintiff State of New York*

FOR PLAINTIFF STATE OF NORTH  
CAROLINA

JOSHUA STEIN

Attorney General of North Carolina

Kunal Janak

Choksi

Joshua Daniel

Abram

Jessica Vance

Sutton

North Carolina Department of  
Justice

114 W. Edenton St.

Raleigh, NC 27603

Telephone: (919) 716-  
6000

E-Mail:

kchoksi@ncdoj.gov

jabram@ncdoj.gov

jsutton2@ncdoj.gov

*Counsel for Plaintiff State of North Carolina*

FOR PLAINTIFF STATE OF TENNESSEE

JONATHAN SKRMETTI  
Attorney General of Tennessee

J. David McDowell  
Christopher Dunbar  
Austin Ostiguy  
Tyler Corcoran  
Office of the Attorney General and Reporter  
P.O. Box 20207  
Nashville, TN 37202  
Telephone: (615) 741-8722  
E-Mail: David.McDowell@ag.tn.gov  
Chris.Dunbar@ag.tn.gov  
austin.ostiguy@ag.tn.gov  
Tyler.Corcoran@ag.tn.gov

*Counsel for Plaintiff State of Tennessee*

FOR PLAINTIFF STATE OF UTAH

SEAN REYES  
Attorney General of Utah

Marie W.L. Martin  
Utah Office of Attorney General  
160 E 300 S, 5th Floor  
P.O. Box 142320  
Salt Lake City, Utah 84114  
Telephone: (385) 881-3742  
E-Mail: mwmartin@agutah.gov

*Counsel for Plaintiff State of Utah*

FOR PLAINTIFF STATE OF ALASKA

TREGARRICK TAYLOR  
Attorney General of Alaska

Jeff Pickett  
State of Alaska, Department of Law  
Office of the Attorney General  
1031 W. Fourth Avenue, Suite 200  
Anchorage, Alaska 99501  
Telephone: (907) 269-5100

E-Mail: Jeff.pickett@alaska.gov

*Counsel for Plaintiff State of Alaska*

FOR PLAINTIFF STATE OF CONNECTICUT

WILLIAM TONG

Attorney General of Connecticut

Nicole Demers

Office of the Attorney General of  
Connecticut

165 Capitol Avenue, Suite 5000

Hartford, CT 06106

Telephone: (860) 808-5202

E-Mail: Nicole.demers@ct.gov

*Counsel for Plaintiff State of Connecticut*

FOR PLAINTIFF STATE OF DELAWARE

KATHLEEN JENNINGS

Attorney General of Delaware

Michael Andrew Undorf

Delaware Department of Justice

Fraud and Consumer Protection Division

820 N. French St., 5th Floor

Wilmington, DE 19801

Telephone: (302) 577-8924

E-Mail: Michael.undorf@delaware.gov

*Counsel for Plaintiff State of Delaware*

FOR PLAINTIFF DISTRICT OF COLUMBIA

BRIAN SCHWALB

Attorney General of the District of Columbia

Elizabeth Gentry Arthur

Office of the Attorney General for the District  
of Columbia

400 6th Street NW

Washington, DC 20001

Telephone: (202) 724-6514

E-Mail: Elizabeth.arthur@dc.gov

*Counsel for Plaintiff District of Columbia*

FOR PLAINTIFF TERRITORY OF GUAM

DOUGLAS MOYLAN  
Attorney General of Guam

Fred Nishihira  
Office of the Attorney General of Guam  
590 S. Marine Corps Drive, Suite 901  
Tamuning, Guam 96913  
Telephone: (671) 475-3324

*Counsel for Plaintiff Territory Guam*

FOR PLAINTIFF STATE OF HAWAI'I

ANNE E. LOPEZ  
Attorney General of Hawai'i

Rodney I. Kimura  
Department of the Attorney General, State of  
Hawai'i Commerce & Economic Development  
425 Queen Street  
Honolulu, HI 96813  
Telephone (808) 586-1180  
E-Mail: Rodney.i.kimura@hawaii.gov

*Counsel for Plaintiff State of Hawai'i*

FOR PLAINTIFF STATE OF IDAHO

RAÚL LABRADOR  
Attorney General of Idaho

John K. Olson  
Office of the Idaho Attorney General  
Consumer Protection Division  
954 W. State St., 2nd Floor  
P.O. Box 83720 Boise,  
ID83720  
Telephone: (208) 334-4114  
E-Mail: John.olson@ag.idaho.gov

*Counsel for Plaintiff State of Idaho*

FOR PLAINTIFF STATE OF ILLINOIS



KWAME RAOUL  
Attorney General of Illinois

Elizabeth  
Maxeiner  
Brian Yost  
Jennifer Coronel  
Office of the Attorney General of  
Illinois  
100 W. Randolph St.  
Chicago, IL 60601  
Telephone: (773) 590-7935  
E-Mail: Elizabeth.maxeiner@ilag.gov  
Brian.yost@ilag.gov  
Jennifer.coronel@ilag.gov

*Counsel for Plaintiff State of Illinois*

FOR PLAINTIFF STATE OF KANSAS

KRIS W. KOBACH  
Attorney General of Kansas

Lynette R. Bakker  
Kansas Office of the Attorney General  
120 S.W. 10th Avenue, 2nd Floor  
Topeka, KS 66612  
Telephone: (785) 296-3751  
E-Mail: Lynette.bakker@ag.ks.gov

*Counsel for Plaintiff State of Kansas*

FOR PLAINTIFF STATE OF MAINE

AARON M. FREY  
Attorney General of Maine

Christina M. Moylan  
Office of the Attorney General of  
Maine  
6 State House Station  
August, ME 04333  
Telephone: (207) 626-8800  
E-Mail: Christina.moylan@maine.gov

*Counsel for Plaintiff State of Maine*

FOR PLAINTIFF STATE OF MARYLAND

ANTHONY G. BROWN  
Attorney General of Maryland

Schonette J. Walker  
Gary Honick  
Office of the Attorney General of Maryland  
200 St. Paul Place, 19th Floor  
Baltimore, MD 21202  
Telephone: (410) 576-6480  
E-Mail: [swalker@oag.state.md.us](mailto:swalker@oag.state.md.us)  
[ghonick@oag.state.md.us](mailto:ghonick@oag.state.md.us)

*Counsel for Plaintiff State of Maryland*

FOR PLAINTIFF COMMONWEALTH OF  
MASSACHUSETTS

ANDREA CAMPBELL  
Attorney General of Massachusetts  
William T. Matlack  
Michael B.  
MacKenzie  
Office of the Attorney General of  
Massachusetts  
One Ashburton Place, 18th Floor  
Boston, MA 02108  
Telephone: (617) 727-2200  
E-Mail: [William.matlack@mass.gov](mailto:William.matlack@mass.gov)  
[Michael.Mackenzie@mass.gov](mailto:Michael.Mackenzie@mass.gov)

*Counsel for Plaintiff State of Massachusetts*

FOR PLAINTIFF STATE OF MINNESOTA

KEITH ELLISON  
Attorney General of Minnesota

Zachary William Biesanz  
Office of the Minnesota Attorney General  
Consumer, Wage, and Antitrust Division  
445 Minnesota Street, Suite 1400  
St. Paul, MN 55101  
Telephone: (651) 757-1257  
E-Mail: [Zach.biesanz@ag.state.mn.us](mailto:Zach.biesanz@ag.state.mn.us)

*Counsel for Plaintiff State of Minnesota*

FOR PLAINTIFF STATE OF NEVADA

AARON D. FORD  
Attorney General of Nevada

Michelle C. Badorine  
Lucas J. Tucker  
Nevada Office of the Attorney General  
100 N. Carson Street  
Carson City, NV 89701  
Telephone: (775) 684-1164  
E-Mail: mnewman@ag.nv.gov  
ltucker@ag.nv.gov

*Counsel for Plaintiff State of Nevada*

FOR PLAINTIFF STATE OF NEW  
HAMPSHIRE

JOHN FORMELLA  
Attorney General of New Hampshire

Brandon Garod  
Office of Attorney General of New  
Hampshire  
33 Capitol Street  
Concord, NH 03301  
Telephone: (603) 271-1217  
E-Mail: Brandon.h.garod@doj.nh.gov

*Counsel for Plaintiff State of New Hampshire*

FOR PLAINTIFF STATE OF NEW JERSEY

MATTHEW PLATKIN  
Attorney General of New Jersey

Isabella R. Pitt  
Deputy Attorney General  
New Jersey Attorney General's Office  
124 Halsey Street, 5th Floor  
Newark, NJ 07102  
Telephone: (973) 648-7819  
E-Mail: Isabella.Pitt@law.njoag.gov

*Counsel for Plaintiff State of New Jersey*

FOR PLAINTIFF STATE OF NEW  
MEXICO

RAÚL TORREZ  
Attorney General of New Mexico

Judith E. Paquin Cholla Khoury  
Assistant Attorney General  
New Mexico Office of the Attorney General  
408 Galisteo St.  
Santa Fe, NM 87504  
Telephone: (505) 490-4885  
E-Mail: jpaquin@nmag.gov  
ckhoury@nmag.gov

*Counsel for Plaintiff State of New Mexico*

FOR PLAINTIFF STATE OF NORTH  
DAKOTA

DREW WRIGLEY  
Attorney General of North Dakota

Elin S. Alm  
Assistant Attorney General  
Consumer Protection and Antitrust Division  
Office of the Attorney General of North Dakota  
1720 Burlington Drive, Suite C  
Bismarck, ND 58504  
Telephone: (701) 328-5570  
E-Mail: ealm@nd.gov

*Counsel for Plaintiff State of North Dakota*  
FOR PLAINTIFF STATE OF OHIO

DAVID YOST  
Attorney General of Ohio

Jennifer Pratt  
Beth Ann Finnerty  
Mark Kittel  
Office of the Attorney General of Ohio  
30 E Broad Street, 26<sup>th</sup> Floor Columbus,  
OH 43215

Telephone: (614) 466-4328  
E-Mail:  
Jennifer.pratt@ohioattorneygeneral.gov  
Beth.finnerty@ohioattorneygeneral.gov  
Mark.kittel@ohioattorneygeneral.gov

*Counsel for Plaintiff State of Ohio*

FOR THE PLAINTIFF STATE OF  
OKLAHOMA

GENTNER DRUMMOND  
Attorney General of Oklahoma

Caleb J. Smith  
Office of the Oklahoma Attorney  
General  
313 NE 21st Street  
Oklahoma City, OK  
73105 Telephone:  
(405) 522-1014  
E-Mail: Caleb.Smith@oag.ok.gov

*Counsel for Plaintiff State of Oklahoma*

FOR PLAINTIFF STATE OF OREGON  
ELLEN ROSENBLUM  
Attorney General of Oregon

Cheryl Hiemstra  
Oregon Department of Justice  
1162 Court St. NE  
Salem, OR 97301  
Telephone: (503) 934-4400  
E-Mail: Cheryl.hiemstra@doj.state.or.us

*Counsel for Plaintiff State of Oregon*

FOR PLAINTIFF COMMONWEALTH OF  
PENNSYLVANIA

MICHELLE HENRY  
Attorney General of Pennsylvania

Tracy W.  
Wertz  
Joseph S. Betsko

Pennsylvania Office of Attorney  
General Strawberry Square  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
E-Mail:  
jbetsko@attorneygeneral.gov  
twertz@attorneygeneral.gov

*Counsel for Plaintiff Commonwealth of  
Pennsylvania*

FOR PLAINTIFF TERRITORY OF PUERTO  
RICO

DOMINGO EMANUELLI HERNANDEZ  
Attorney General of Puerto Rico

Guarionex Diaz Martinez  
Assistant Attorney General Antitrust Division  
Puerto Rico Department of Justice  
P.O. Box 9020192  
San Juan, Puerto Rico 00902  
Telephone: (787) 721-2900, Ext. 1201  
E-Mail: gdiaz@justicia.pr.gov

*Counsel for Plaintiff Territory Puerto Rico*

FOR PLAINTIFF STATE OF RHODE ISLAND

PETER NERONHA  
Attorney General of Rhode Island

Stephen Provazza  
Rhode Island Office of the Attorney  
General  
150 South Main Street  
Providence, RI 02903  
Telephone: (401) 274-4400  
E-Mail: SProvazza@riag.ri.gov

*Counsel for Plaintiff State of Rhode Island*

FOR PLAINTIFF STATE OF SOUTH DAKOTA

MARTIN J. JACKLEY  
Attorney General of South Dakota

Yvette K. Lafrentz  
Office of the Attorney General of South  
Dakota  
1302 E. Hwy 14, Suite 1  
Pierre, SD 57501  
Telephone: (605) 773-3215  
E-Mail: Yvette.lafrentz@state.sd.us

*Counsel for Plaintiff State of South Dakota*

FOR PLAINTIFF STATE OF VERMONT

CHARITY R. CLARK  
Attorney General of Vermont

Christopher J. Curtis, Assistant Attorney  
General  
Office of the Attorney General of Vermont  
109 State St.  
Montpelier, VT 05609  
Telephone: (802) 828-3170  
E-Mail: christopher.curtis@vermont.gov

*Counsel for Plaintiff State of Vermont*

FOR PLAINTIFF COMMONWEALTH OF  
VIRGINIA

JASON S. MIYARES  
Attorney General of Virginia

Tyler T. Henry  
Office of the Attorney General of Virginia  
202 N. 9th Street  
Richmond, VA 23219  
Telephone: (804) 692-0485  
E-Mail: thenry@oag.state.va.us

*Counsel for Plaintiff State of Virginia*

FOR PLAINTIFF STATE OF WASHINGTON

ROBERT FERGUSON  
Attorney General of Washington

Amy Hanson

Washington State Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
Telephone: (206) 464-5419  
E-Mail: Amy.hanson@atg.wa.gov

*Counsel for Plaintiff State of Washington*

FOR PLAINTIFF STATE OF WEST VIRGINIA

PATRICK MORRISEY  
Attorney General of West Virginia

Douglas Lee Davis  
Office of the Attorney General, State of  
West Virginia  
1900 Kanawha Boulevard  
East Building 6, Suite 401  
P.O. Box 1789  
Charleston, WV 25305  
Telephone: (304) 558-8986  
E-Mail: Douglas.l.davis@wvago.gov

*Counsel for Plaintiff State of West Virginia*

FOR PLAINTIFF STATE OF WYOMING

BRIDGET HILL  
Attorney General of Wyoming

Amy Pauli  
Wyoming Attorney General's Office  
2320 Capitol Avenue  
Kendrick Building Cheyenne, WY 82002  
Telephone: (307) 777-6397  
E-Mail: amy.pauli@wyo.gov

*Counsel for Plaintiff State of Wyoming*

FOR DEFENDANT GOOGLE LLC

By: /s/ John E. Schmidtlein  
John E. Schmidtlein (D.C. Bar No. 441261)  
Benjamin M. Greenblum (D.C. Bar No. 979786)  
Colette T. Connor (D.C. Bar No. 991533)  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, SW



Washington, DC 20024  
Tel: 202-434-5000  
jschmidtlein@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)  
1700 K Street, NW  
Washington, DC 20006  
Tel: 202-973-8800  
screighton@wsgr.com  
frubinstein@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

Matthew McGinnis (admitted *pro hac vice*)  
Prudential Tower  
800 Boylston Street  
Boston, MA 02199  
Tel: 617-951-7703  
Matthew.McGinnis@ropesgray.com

*Counsel for Defendant Google LLC*