



United States & Co-Plaintiff States v. Google LLC

Professor Lorin Hitt

Ex. No.

PXRD026

1:20-cv-03010-APM

1:20-cv-03715-APM



Trial Testimony of

Elizabeth Reid

VP of Search (Google)

Q. Would you agree that **Gemini app incorporates elements of the Google Search web index** through Fast Search?

A. Yes.

Q. And would you agree that the Gemini app, when it submits a request or when it grounds itself to Search, it **relies on a subset of a Google Search ranking** through Fast Search?

A. Yes.



Trial Testimony of Nick Turley

Nick Turley

Head of Product, ChatGPT (OpenAI)

"I say all this with a lot of humility, because **we haven't even gotten to the 80 percent yet**, right? We're far, far earlier in the journey. But it is our belief that about half or so -- a bit more than half of what our users want to do in ChatGPT relies on **long-tail queries**, on things that don't come up so often....So we think that **the final 20 percent is going to be full of these kind of cases...**"



Trial Testimony of Michael Schechter

Michael Schechter

VP of Growth, Bing (Microsoft)

“So for the query, you know, for example, if Bing does not get many **local queries** because our quality is poor and you were having a CoPilot Chat about great pizza restaurants nearby, CoPilot might not know how to make the best query to get the best results out because **it just hasn’t seen enough of the Bing queries to do that**. And then the other aspect is, we’re only as good as the data that Bing has.”



Trial Testimony of Eli Collins

Eli Collins

VP of Product, DeepMind (Google)

“The Gemini app will often include -- will annotate the output and **provide links to the URLs that came back from the Search results.**”