



United States & Co-Plaintiff States v. Google LLC

Plaintiffs' Remedies Closing Argument

Distribution Remedies, Chrome Divestiture, Remaining Remedies, & Term of Judgement

May 30, 2025

REDACTED PUBLIC VERSION

Distribution Remedies



Plaintiffs Distribution Remedies

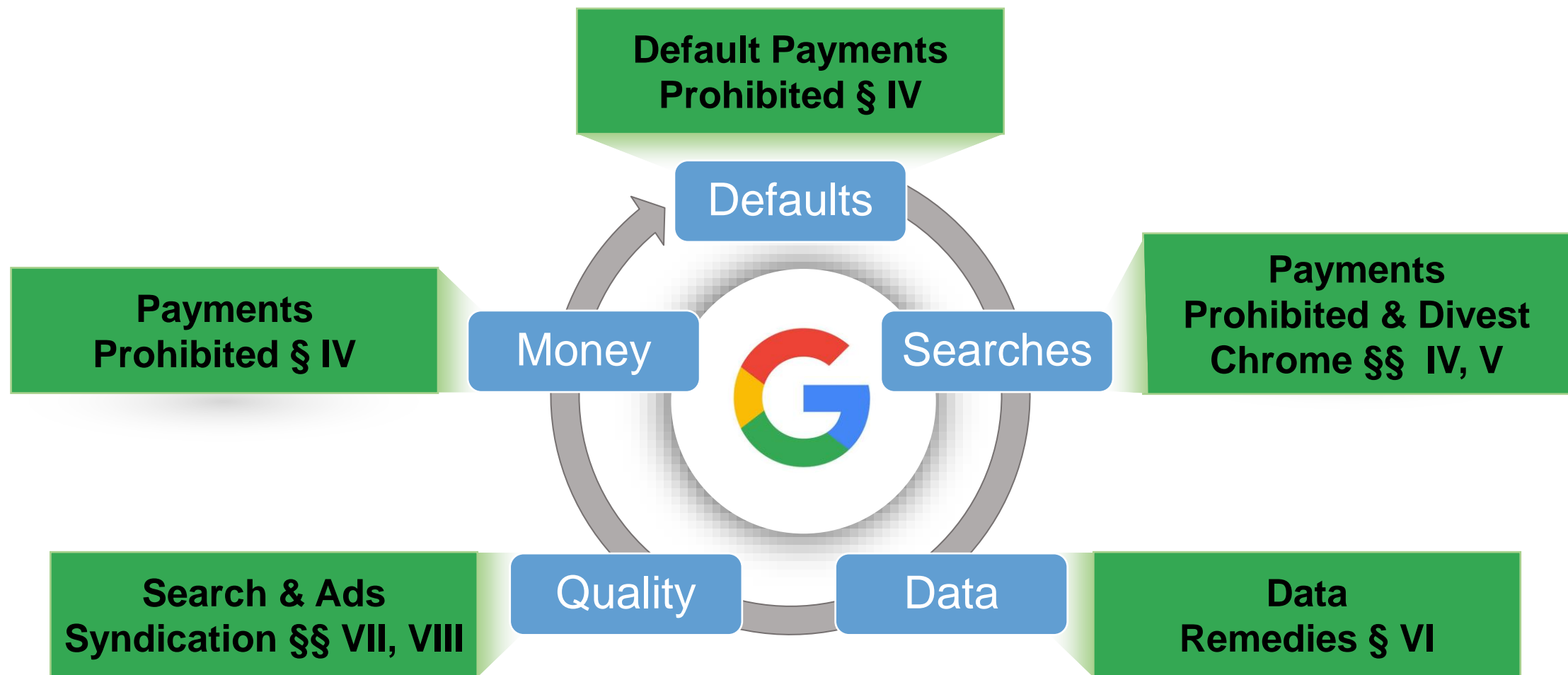
1 Default Payments

2 Generative AI

3 Choice Screens



Plaintiffs' Remedies Enable Competition





Google's Distribution Payments Froze The Ecosystem

“And so that’s the net effect of the - of the payments. They basically freeze the ecosystem in place effectively.”

- Sridhar Ramaswamy



Distribution Partners Don't Have A Choice Today



Eddy Cue

Senior Vice President of Services
Apple

“The other problem with it is, we don’t really have a choice today.”



Apple Agrees: Payments Are A “Disincentive”



Eddy Cue

Senior Vice President of Services
Apple

“I did read Your Honor’s statement when you mentioned that it was a **disincentive for us to do a search engine based on the payments** that we were receiving from Google. **And I can’t say I would disagree with that statement.** I understand the statement. **It’s a significant amount of money.**”



Google Can Pay More Than Anyone



Eric Muhlheim

Chief Financial Officer
Mozilla

“Even under the contract that we have right now, based on the characteristics of Bing as a search engine, it would **not monetize that traffic as effectively as Google monetizes that traffic.**”



Revenue Share Limits “True Freedom”



Dmitry Shevelenko

Co-Founder
Perplexity

“ . . . [T]rue freedom means, you know, **not fearing lost revenue or threats of loss revenue or lower rev-share rates** It’s not just, you know, Google’s proposed remedy of saying they will not enter exclusive agreements. That does not at all satisfy what we think is important to unlock user choice.”



Distribution Is “Existential”



Nick Turley

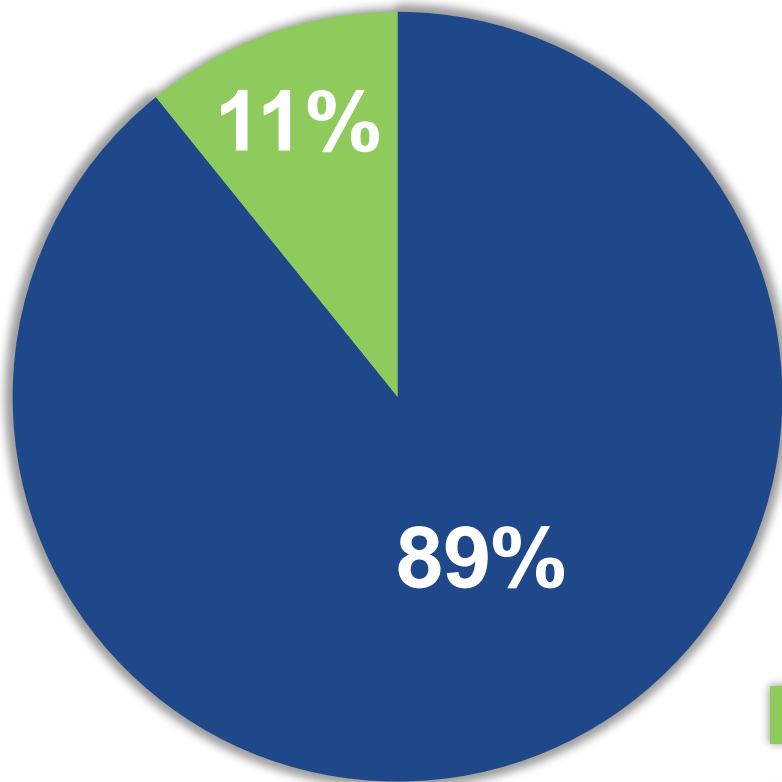
Head of Product, ChatGPT
OpenAI

“If we don’t have **distribution** or if other products have distribution and not us, they may -- consumers may perceive that that is the only product available to them. So this **is very critical**, and I think I’ve argued to our teams internally on numerous times that **it is, in fact, existential.**”

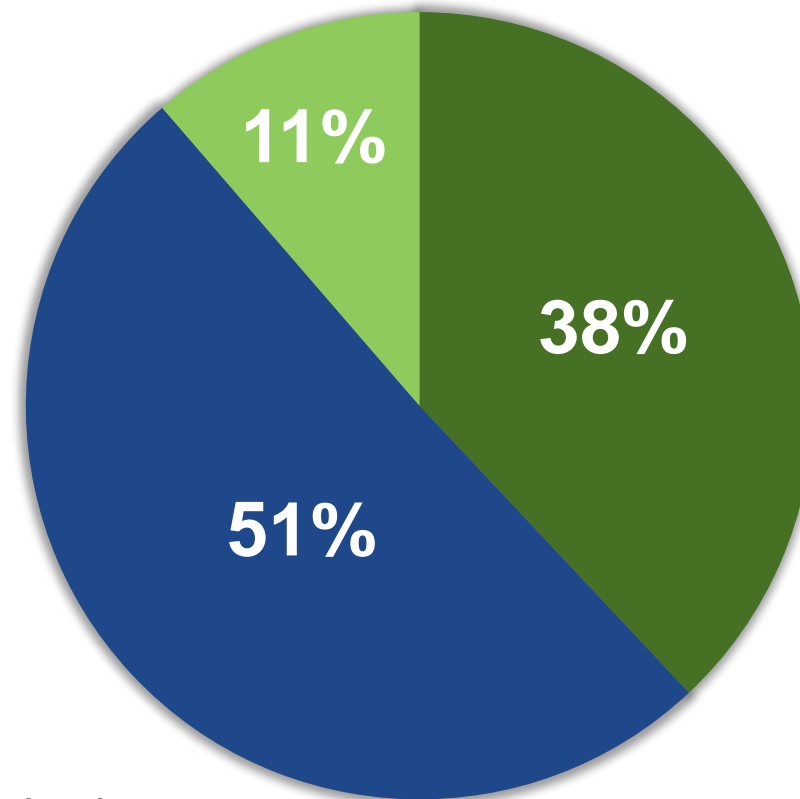





Potential Share Shift in the Remedial World

2020 Actual Shares



Remedial World Estimated Shares

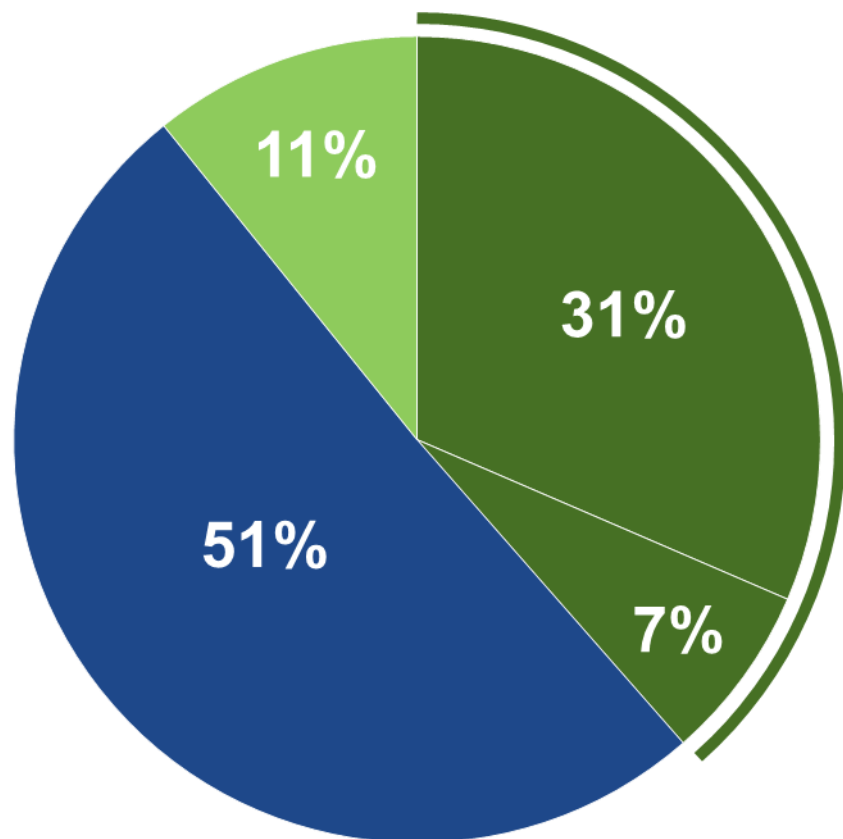


-  Rivals' pre-remedy share
-  Rivals' incremental post-remedy share
-  Google's share






Payment Bans Expected to Shift Share to Rivals

Remedial World Estimated Shares



38% potential share shift

- 18% Apple
- 13% Android
- 7% User-downloaded Chrome
- 0.6% Third-party browsers

-  Rivals' pre-remedy share
-  Rivals' incremental post-remedy share
-  Google's post-remedy share



Google Can And Will Still Compete



Tasneem Chipty, Ph.D.

Plaintiffs' Expert

Founder and Managing Principal

Chipty Economics, LLC

“But the point is, in the remedial world, if -- well, first of all, **Google will still be able to compete**, so it's not like Microsoft would be undisciplined by competition. Second of all, if the Court adopts some version of the data and syndication remedies, that will **give other firms a chance to actually be in the game**, and so I think it's a timing issue.”



Prohibiting Defaults Is Not Enough



Gabriel Weinberg

CEO

DuckDuckGo

“**[J]ust a ban on default** would leave the potential for other payments, be it rev share or other preferential payments, any such payments just have a **strong financial incentive** to have, you know -- **steer users towards Google and away from alternatives**. And so I think of them as essentially the functional equivalent as a default, as an exclusive default. And so, no, I don’t think that would be enough.”



Unconditional Revenue Share Preserves The Status Quo



Prof. Kevin Murphy

Google's Expert

Professor of Economics

University of Chicago

- Q.** And am I right that in liability you argued that **if Google were permitted to pay distributors revenue share** with . . . no promotional requirements, the distributors would make Google the default, which **replicates the outcome we have today**; is that right?
- A.** I don't remember saying that's for sure what would happen. **I think that's a likely outcome.**

Generative AI



Search and GenAI Overlap



And there's lots we can solve beyond what Search does today





GenAI Will Not Replace Search



Elizabeth Reid

Vice President of Search
Google

Q. And you also believe that **the advent of AI and LLMs has not eliminated the need for Search**. Right?

A. Correct.

. . . .

Q. You do not believe that the use of LLMs in Search can replace the functionality of Search itself. Correct?

A. I do not think LLMs by themselves will replace all of Search functionality.



GenAI Expands Use of Search



Sundar Pichai

Chief Executive Officer
Google

“To be very clear, I think **the Gemini app will overall expand our ability to serve users’ information needs**. There will be some overlap with Search, there will be some things which won’t have anything to do with what we call as -- or think of as Search today; but overall, I think **it will expand in a user’s information needs**.”



“Supercharge Search” Combined with LLMs

Sept. 2023

Evolution of Search and Assistant Experiences

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EX No.
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Magi: Supercharge Search through the power of LLMs

March 2023

LLM Superpowers

Synthesis

- Condense a large amount of info into key points
- Find and stitch together disparate info
- Combine multiple sources to understand overall perspective(s)
- Reduce literacy level required

Creation & Execution

- Choose an option as a jumping off point
- Generate draft proposal / plan
- Enable iterative customization to match specific needs
- Take action on your behalf

Conversation

- Stateful journey progression
- Collaboration

Search Superpowers

Reliability

- High quality / trustworthy information
- Sources enable user to establish reliability of information

Breadth & Depth

- Multi-format: Text, Visual, Video, Maps Content
- Rich 1P Data across verticals
- Perspectives from Human and Authoritative Voices
- Multimodal input



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10



AI Overviews Integrate Google Search Ranking And Quality

Reviewer Type	Reviewer	LGTM / Date
Product	Elizabeth Hamon Reid Robby Stein Srinivasan (Cheenu) Venkatachary Hema Budaraju Phiroze Parakh Matthew Gray	ER: LGTM but see comments RS: LGTM CV: LGTM with comments HB: PP: MG:
Comms Team	Crystal Dahlen Lara Levin Ashley Thompson Ned Adrianca Meghann Farnsworth	CD: LL: LGTM AT: NA: LGTM MF
T&S / RAI	Beth Tsai Michelle Chang	BT MC
Mktg	Approvers: Rossa Hsieh Melissa Winter Notify: Rebecca Michael Heaven Kim	RH: LGTM MW: LGTM with comments
GAPP	Ben Petrosky Christian Wagner	BP CW: LGTM
Legal	Rich Lee	RL: LGTM 6/13

[Majority of content adapted from SGE explainer and approved statements and background we've provided to press]

How AI Overviews in Search Work

Recently, we launched AI Overviews on Search. In this document, we'll explain how AI Overviews work, how they can be helpful, and the work we've done to prioritize quality and safety in this experience.

The fundamentals

AI Overviews use generative AI to provide key information about a topic or question, with links to dig deeper and learn more on the web.

This application of generative AI has been specifically designed to be helpful for information journeys in Search, meaning it's a different experience than interacting with an LLM-based chatbot. AI Overviews use a customized Gemini model, which works in tandem with our existing Search systems – like our quality and ranking systems and the Google Knowledge Graph. AI Overviews are designed to carry out traditional “search” tasks, like identifying relevant, high-quality results from our index to support the information presented in the overview. ^{N3}

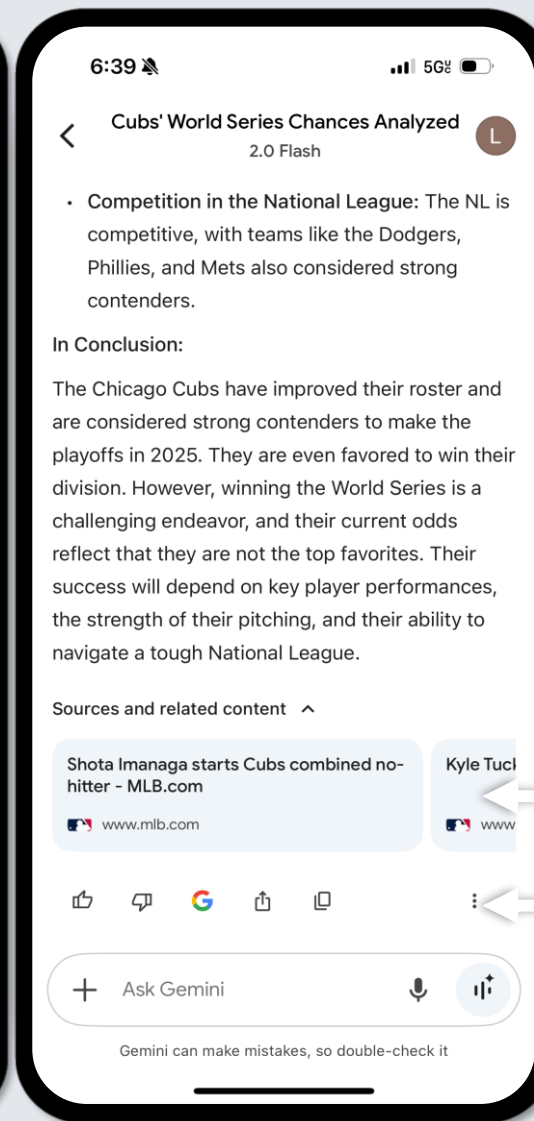
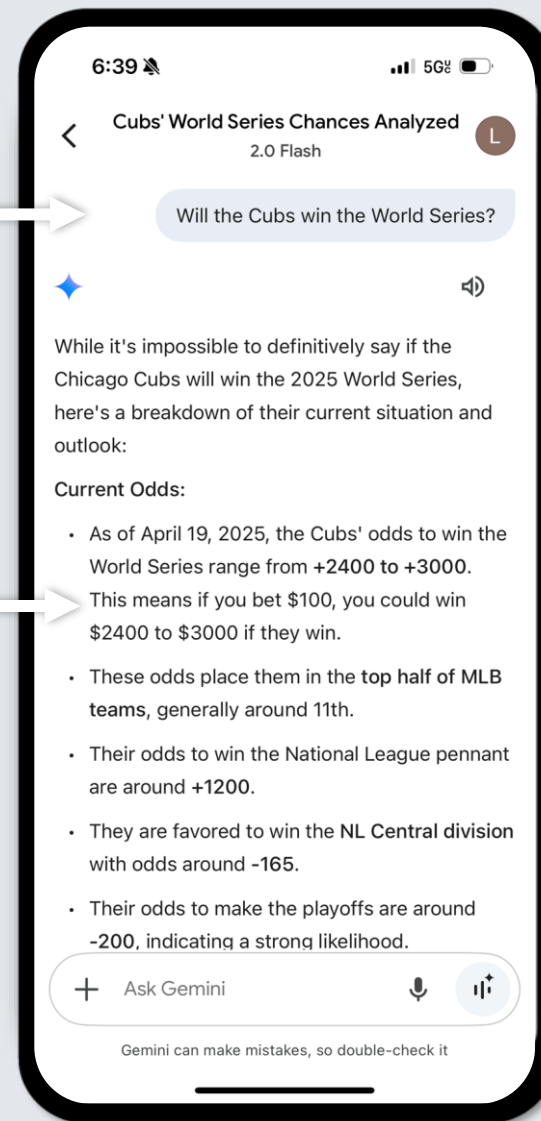
To ensure that AI Overviews are high quality, we've integrated our core web ranking systems into this experience, which are fundamentally designed to surface reliable and relevant information. AI Overviews are built to only surface information that is backed up by top web results, and include links to web content that supports the information presented in the overview. People can use these links to dig deeper on a topic, because we know people come to Search to find a range of perspectives and to explore the open web.



Gemini App Is A New Search Access Point

Query:
“Will the Cubs win
the World Series?”

Gemini Response



Search Results

Search Link



Google “Exploring” Gemini In Search

Google

Exploring Gemini in Search

Exec Review

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Explorations

How can Gemini help?

Draft a text message to my nanny providing feedback.



Brainstorm constructive nanny feedback



Roleplay with

All

Gemini

News

Videos



Gemini suggestions

Provide rankable Gemini suggestions depending on query

Search mode

Users explicitly switch between search and a Gemini-powered conversational mode

Persistent Gemini entry point

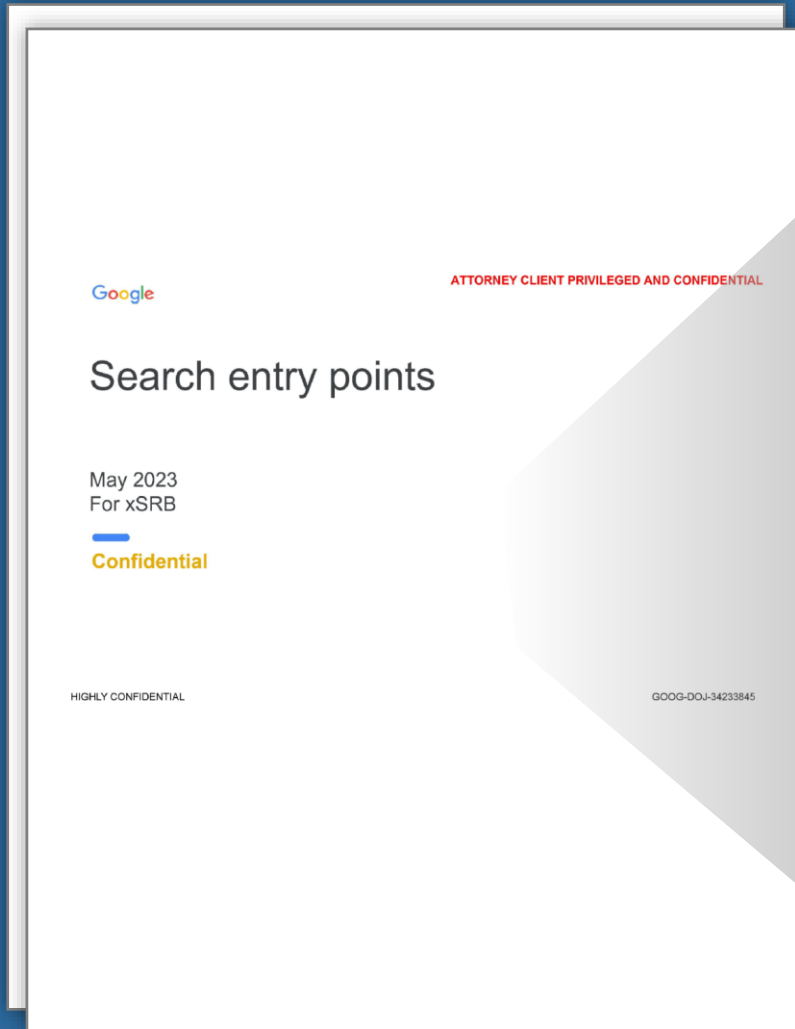
Provide persistent & deterministic access to conversational Gemini for deeper engagement

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Google Concerned About “Ceding” GenAI Ecosystem



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Executive summary

Tl;dr: The introduction of AI is creating new access points, allowing other providers to reach users rapidly; Google should meet users where they are or risk ceding a new ecosystem

Context: A changing Search landscape

- New AI access points are rapidly expanding (e.g. chatbots LLM)
- Search intent continues to shift off the web and into mobile apps (>90% of user time)
- iOS continues to introduce 1P search experiences on device

Response: Explore new Google access points (in AI, in apps), by testing an embedded Search experience for 2 partner segments: Browsers/Search Engines (AI) and Mobile Apps (AI/non-AI)

Opportunity: Significantly advance our global strategy to...

- 1 Integrate with new GenAI experiences from LLM-based conversational AI providers
- 2 Address shifting search intent (particularly within GloYo and APAC); TAM = 180B+ annual queries
- 3 Diversify Google Search pathways on iOS + boost iGA engagement

Ask: Approval to pilot embedded Google Search with up to 15 partners in 2023 to validate hypotheses and refine offering

Google

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Google Paying Enormous Sums For Gemini Default

GEMINI COMMERCIAL AGREEMENT

This Gemini Commercial Agreement, including all attachments (collectively referred to as this "Agreement"), effective as of the date noted above (the "Effective Date"), is made between:

GOOGLE LLC, organized in the state of Delaware, **GOOGLE ASIA PACIFIC PTE. LTD.**, organized in Singapore, and **GOOGLE IRELAND LIMITED**, organized in Ireland (in this Agreement, "Google" will mean Google LLC, Google Asia Pacific Pte. Ltd., and/or Google Ireland Limited, as the context requires), on the one hand; and

SAMSUNG ELECTRONICS CO., LTD., a company existing under the laws of the Republic of Korea ("Company"), on the other hand.

Fixed Monthly Payment.

(i) Google will pay Company [REDACTED] dollars (\$ [REDACTED]) per calendar month during the Term (each, a "Fixed Monthly Payment").

Activation Bonus. For each calendar month during the Term, Google will pay Company a bonus for each Gemini Qualified Device that is Activated by an End User in a Territory during such calendar month (collectively, the "Activation Bonus"). The Activation Bonus amount for each Activated Gemini Qualified Device that is a New Device or Installed Base Device (as applicable) in a given Territory will be based on the pricing described in Attachment A-2. Company may only receive an Activation Bonus once for each Gemini Qualified Device.

Shared Net Gemini Ad Revenue. For each calendar month during the Term, Google will pay Company [REDACTED] of Net Gemini Ad Revenue ("Shared Net Gemini Ad Revenue") generated during such calendar month.

Google Confidential

GEMINI COMMERCIAL AGREEMENT

Google	Google LLC Google Asia Pacific Pte. Ltd. Google Ireland Limited	Mobile Partnerships: Christopher LI, Jinyoung Baik, David Kim
	Google Legal: Kate Lee, Larry Huang, Marie Mackey	

Address for Legal Notices:
1600 Amphitheatre Parkway
Mountain View, CA 94043

COMPANY CONTACT DETAILS		
	Company Contact Information:	Company Legal Notices to:
Attention:	Jay Kim, Seung Song	Ju Hyun Yoo, Jayun Chung
Title:	Strategic Partnership Team (Mobile)	Legal Support & Compliance Group (Mobile)
Address, City, State, Postal Code, Country:	129 Samsung-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, Korea 16677	129 Samsung-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, Korea 16677
Email:	[REDACTED]@samsung.com [REDACTED]@samsung.com	[REDACTED]@samsung.com [REDACTED]@samsung.com

Effective Date: January 1, 2025

Term: Starting on the Effective Date and continuing through December 31, 2027 (inclusive) ("Term").

Renewal Term: The Term will automatically be extended through December 31, 2028 (inclusive), unless either party provides written notice to the other party in accordance with Section 8.1. For clarity, the Term will include the Renewal Term, if extended.

1

Gemini Commercial Agreement

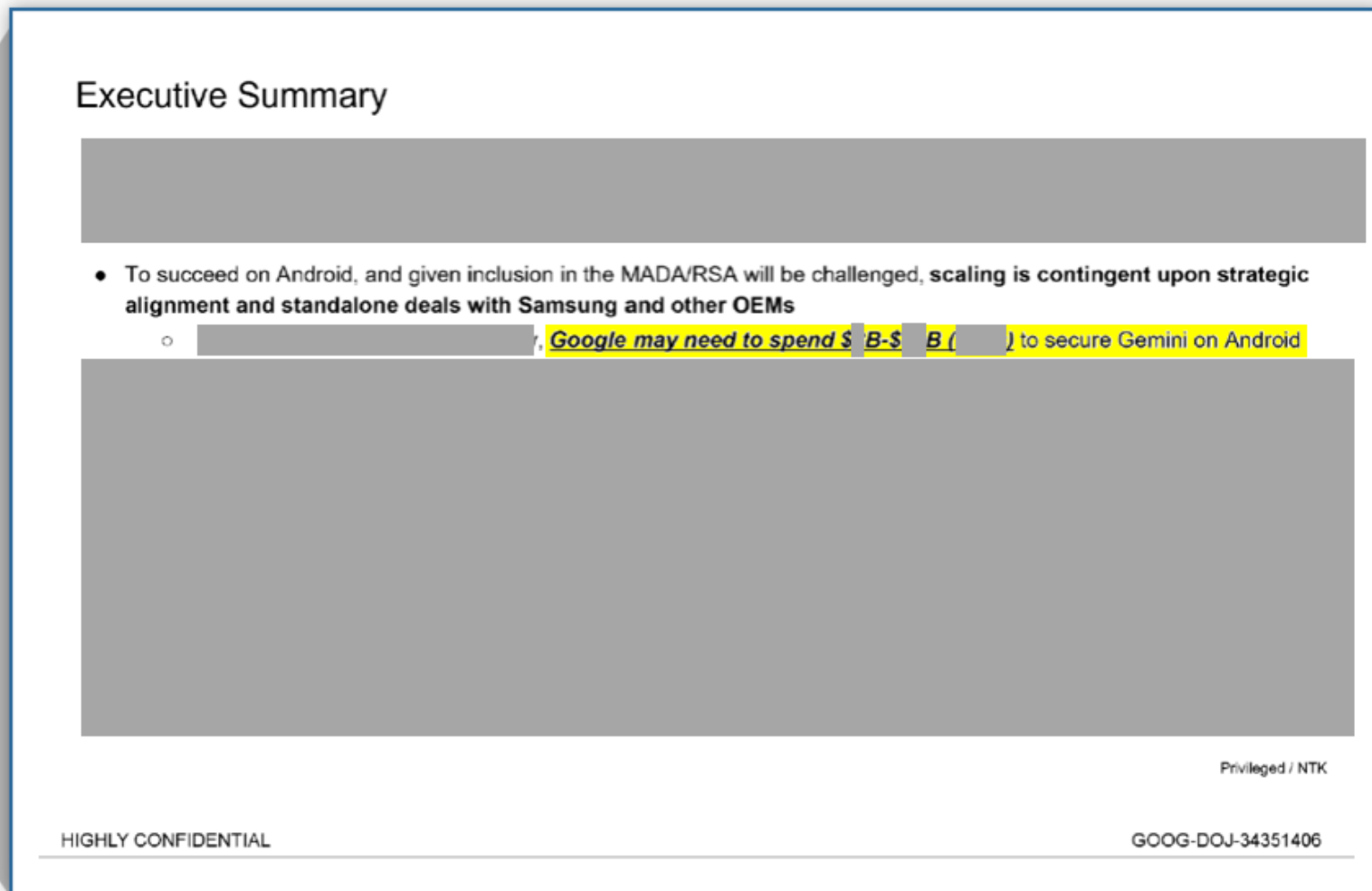
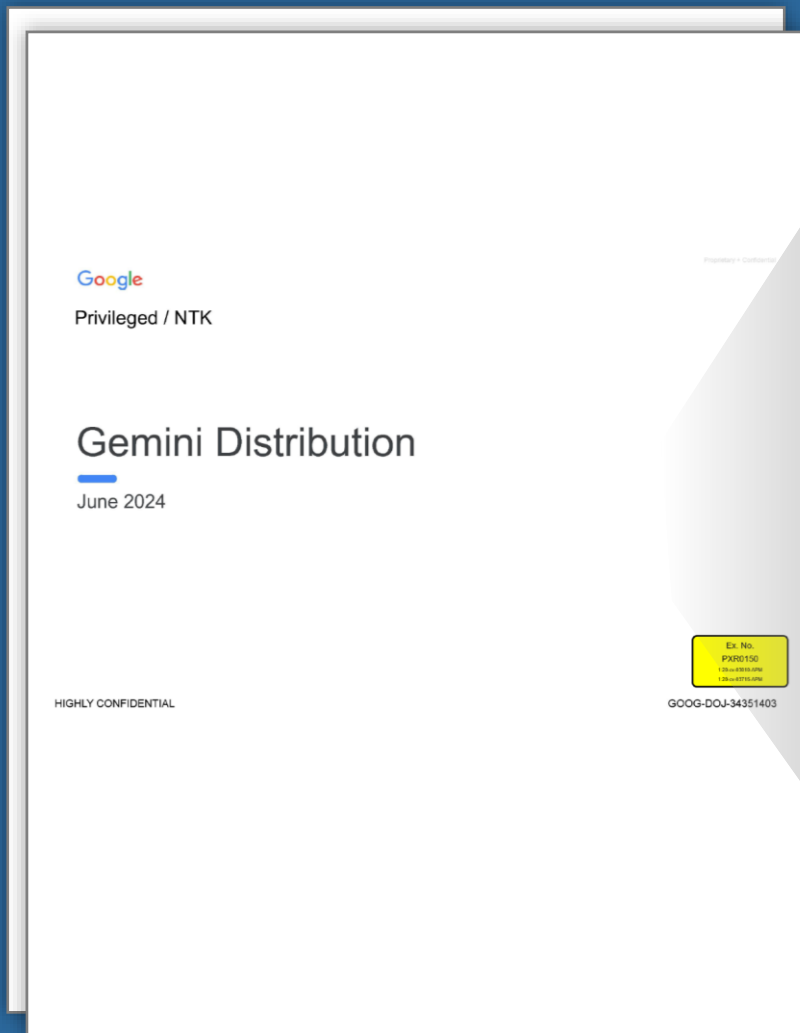
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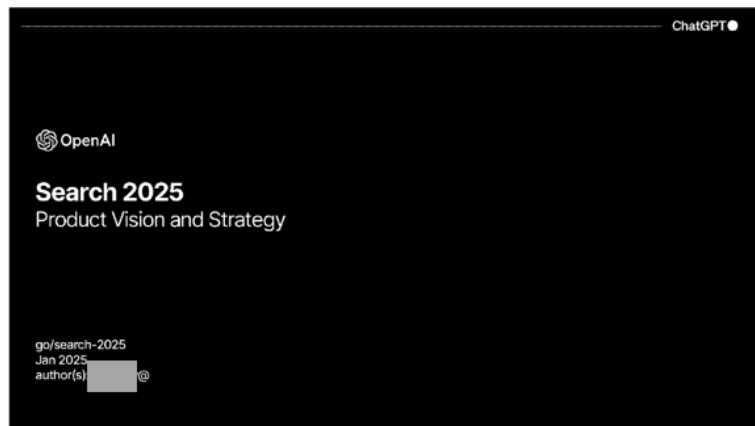


Google Plans To Spend Billions To “Secure Gemini On Android”





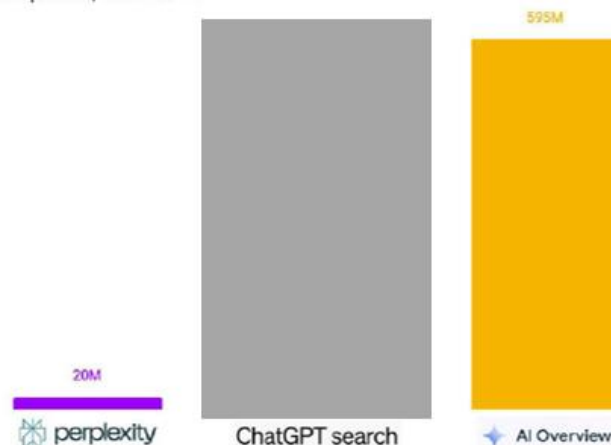
Google Dominates All Searches



ChatGPT ●

To put that into competitive context, ChatGPT has [redacted] the daily searches as Perplexity; AI overviews is [redacted] ChatGPT search

Daily GenAI Search Messages
By Competitor, Dec 2024



Sources:

(based on)

- AI Overviews are [redacted] of Google's 8.3B daily queries = 595M daily queries (reports vary however, and could be as high as 14% of queries)
- Perplexity's 20M daily messages is the [redacted] in Dec, up from 2M at beginning of 2024.
- Note in Jan, we've hit [redacted] daily

Proprietary and confidential

Choice Screens



Choice Screens Alone Are Not Enough



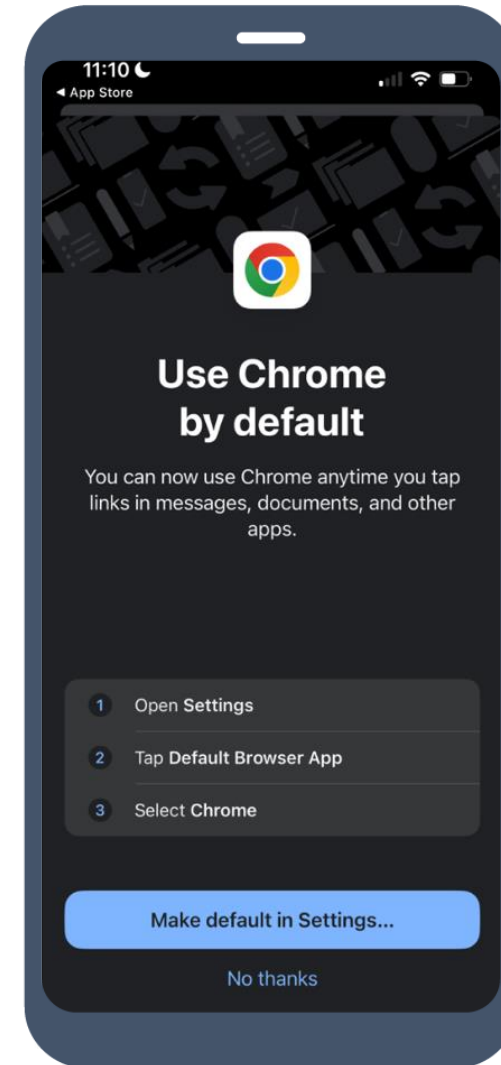
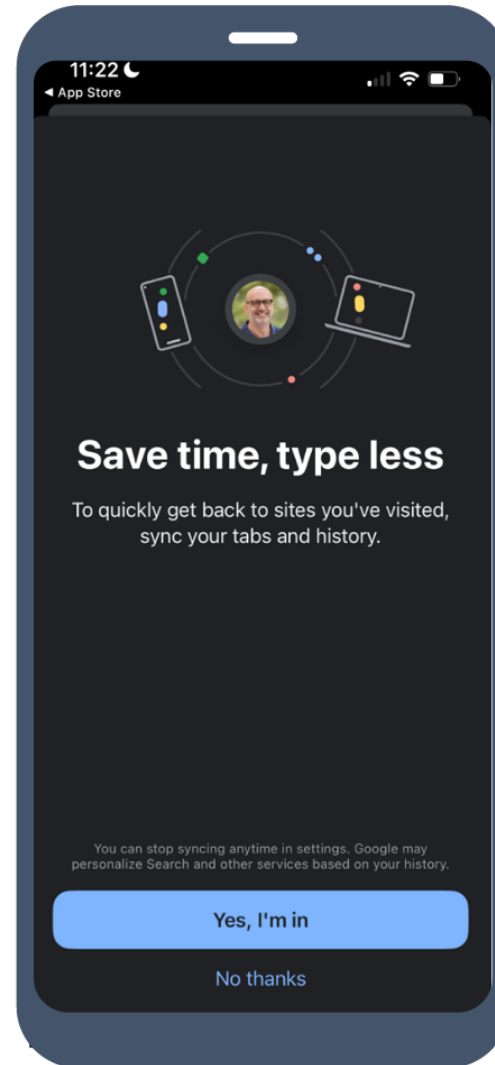
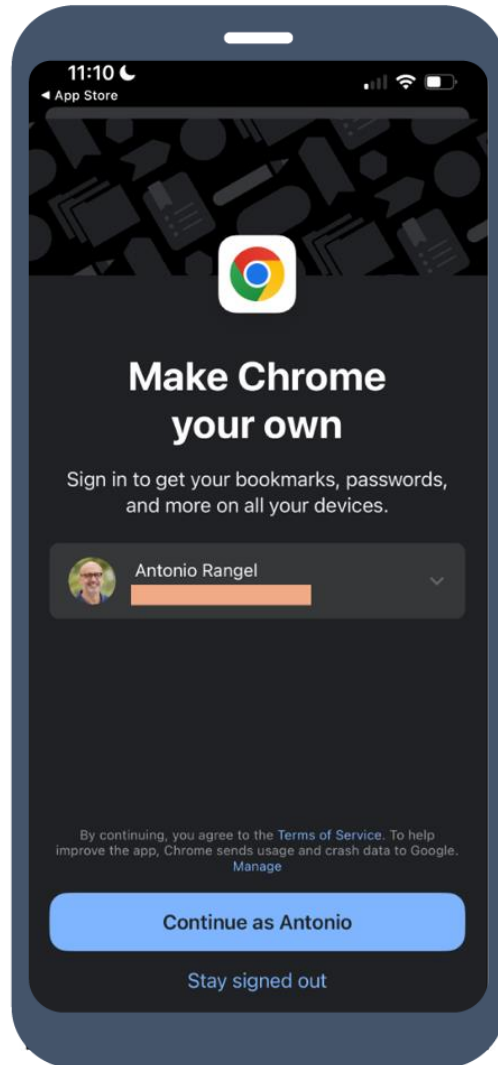
Eddy Cue

Senior Vice President of Services
Apple

“You know, we do a **choice screen**, but it’s not going to matter. **It’s not going to matter until one of the choices is actually really valuable** that provides new capabilities.”



Google Uses Choice Screens In Chrome



Chrome Divestiture



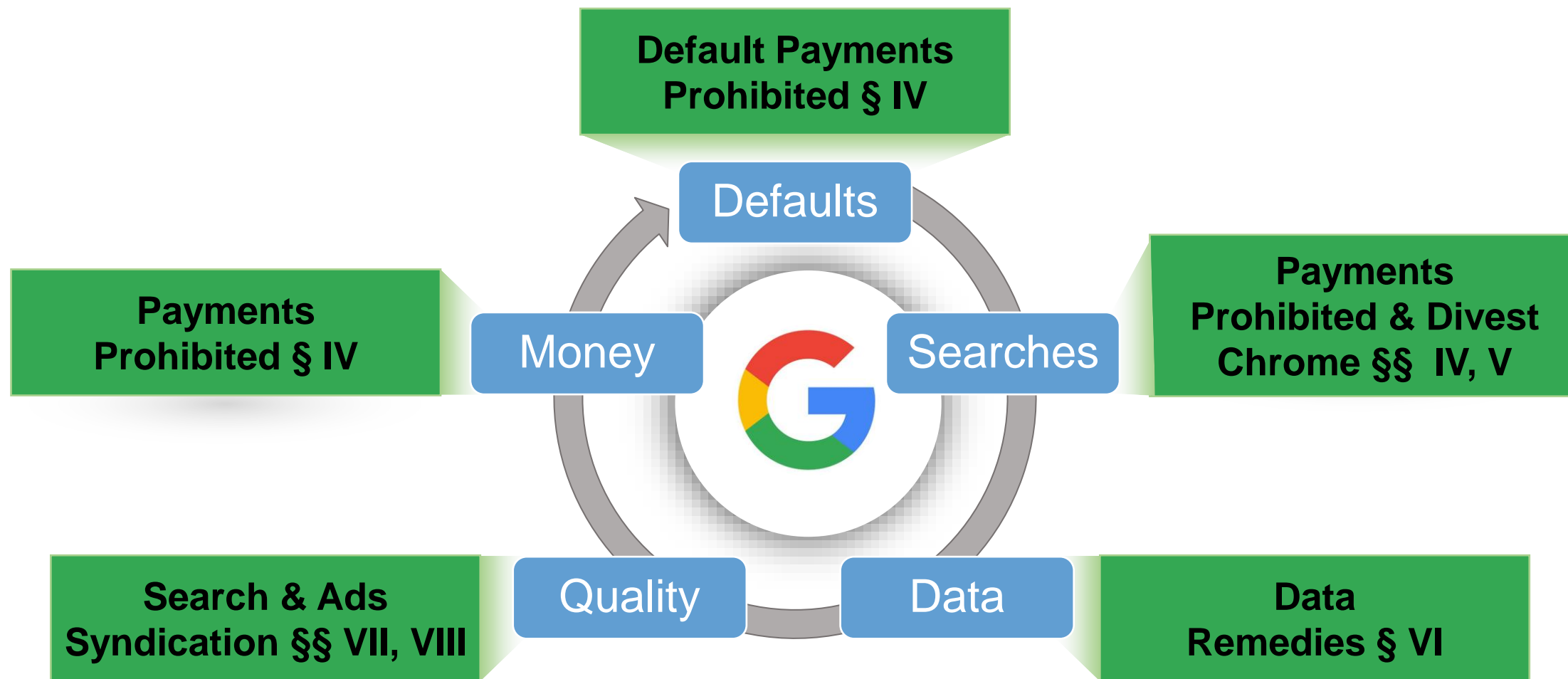
Divestiture Is An Important Antitrust Remedy

“And divestiture is a **common form** of relief in successful antitrust prosecutions: it is indeed ‘**the most important of antitrust remedies.**’”

Microsoft III, 253 F.3d at 105 (quoting *United States v. E.I. du Pont de Nemours & Co.*, 366 U.S. 316, 331 (1961))
(emphasis added).



Plaintiffs' Remedies Enable Competition





The “Main Use Case” For Browsers Is Search



Eric Muhlheim

Chief Financial Officer

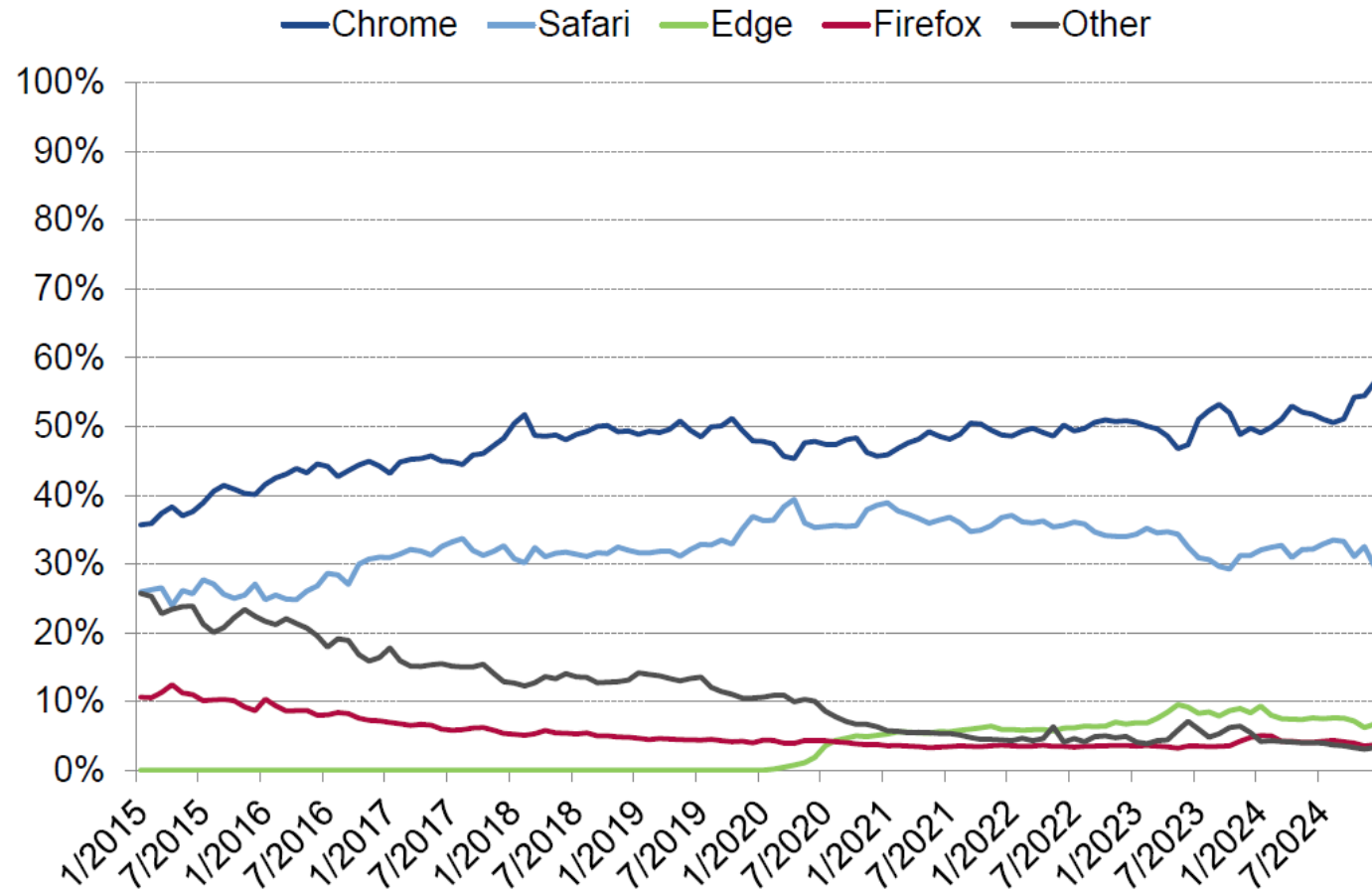
Mozilla

“[T]he principal use of a browser is for people to travel or surf the Internet. And **one of the main use cases of that is to search for things on the Internet**, so we need Firefox to be able to enable that search behavior in the most efficient and effective way possible.”



Chrome Is Most Widely Used Browser In The United States

StatCounter US Browser Shares, January 2015 to December 2024 (All Devices)



Chipty Report, Figure 8; StatCounter, <https://gs.statcounter.com/browser-market-share/desktop-mobile-tablet/united-states-of-america/#monthly-201501-202412>.

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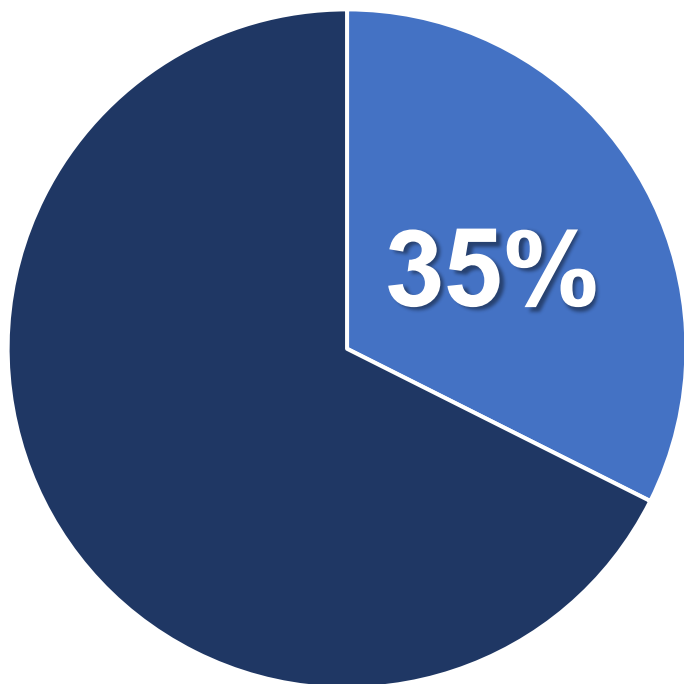


Chrome Is Search Access Point For 35% Of Queries

Google Queries Through Chrome



% of Total Google Queries 2024



- **78%** of Google's US queries came from a browser
- **35%** from Chrome
- **20%** of Google's US queries came from the default on user-downloaded Chrome



Chrome Drives Significant Search Revenue

Chrome Review

May 2nd 2024



Ex. No.
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Classified by
[redacted]

[go/chrome-strategy](#)
[go/chrome-2024](#)
[go/chrome-OKRs](#)

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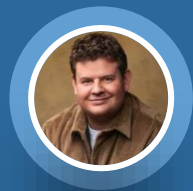
[redacted]
or [redacted] of Google's
2023 Search &
Display Revenue
flowed through
Chrome clients

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Many Likely Bidders For Chrome



Nick Turley

OpenAI

Q. Mr. Turley, if the Court were to order Chrome to be divested, **would OpenAI be interested in purchasing Chrome?**

A. **Yes**, we would as would many other parties, I'm sure.



Dmitry Shevelenko

Perplexity

Q. Mr. Shevelenko, do I understand your testimony today to say that **Perplexity would be interested in acquiring Chrome?**

A. **Yes.**



Gabriel Weinberg

DuckDuckGo

A. . . . It's essentially the **gateway to the Internet** for most people. I would think that pretty much **all the big tech companies would be interested**, and there would be some kind of bidding war for it.



Brian Provost

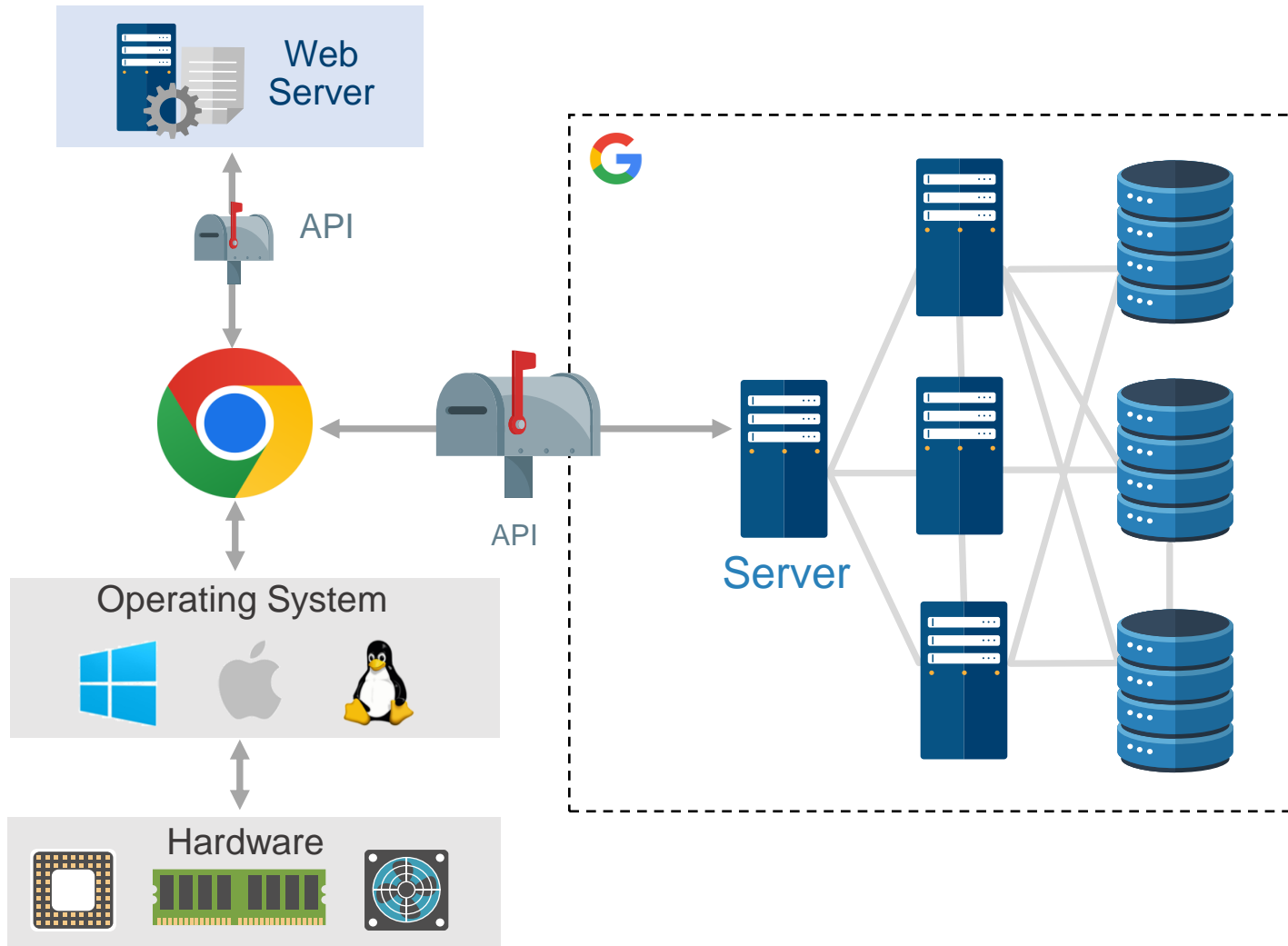
Yahoo

Q. If the Court ordered Google to divest the Chrome browser, **would Yahoo be interested** in bidding for it?

A. **Yes. . . . It's arguably the most important strategic player on the web search.** It's something we've considered, not only just for search but its ability to represent -- render and distribute all of the Yahoo products.



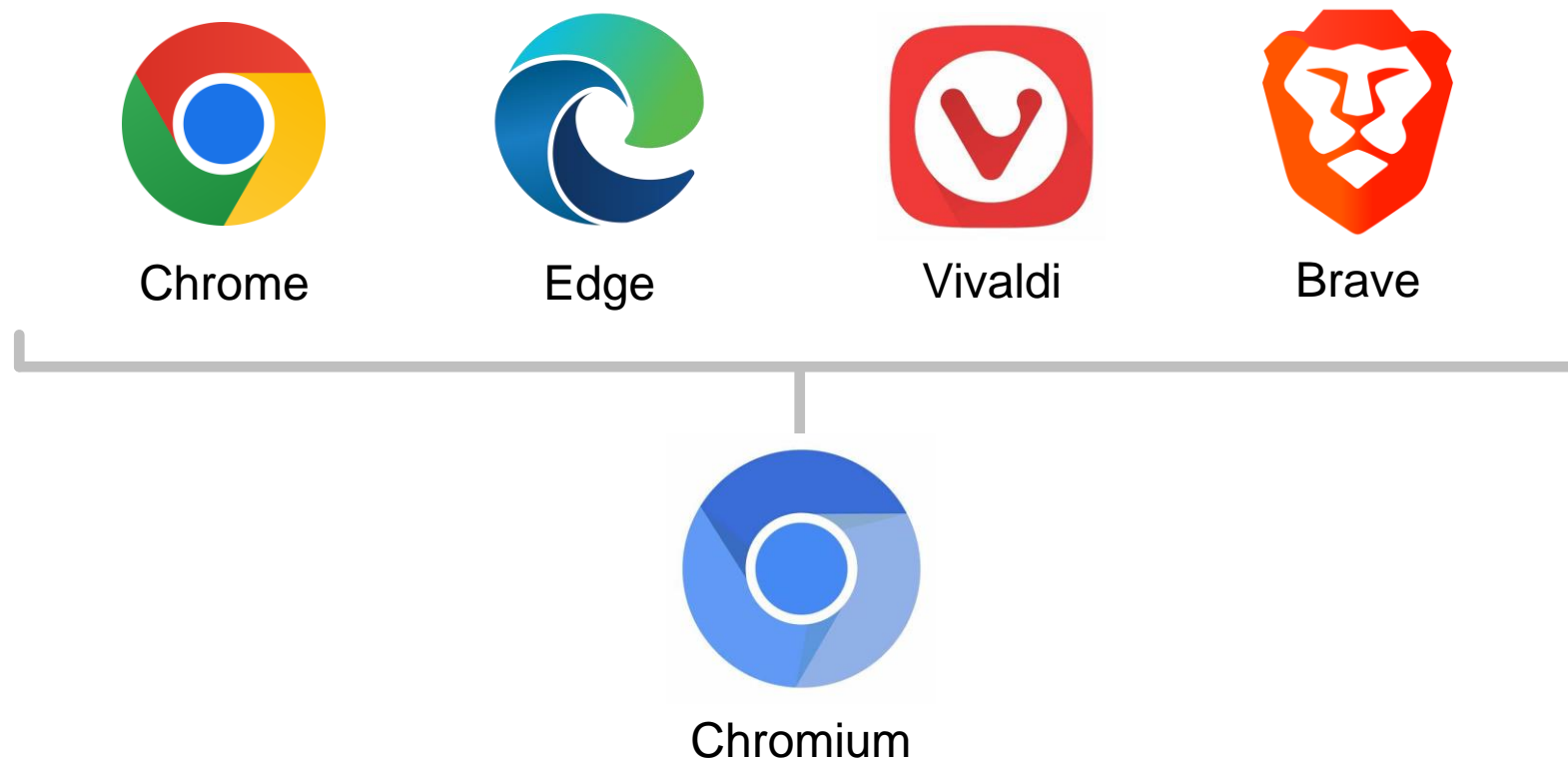
Chrome Divestiture Is Technically Feasible



- Chrome is a piece of client software
- Chrome connects to Google through APIs
- A new owner of Chrome could connect to Google



Chromium Ecosystem Supported By Many





Other U.S. Companies Can Provide Data Security



Sundar Pichai

Chief Executive Officer
Google

- Q.** Now, you would agree, Mr. Pichai, that Google is not the only U.S. company capable of providing **data security** to its users, correct?
- A.** That's correct.
- Q.** You similarly are not taking the position that Google is the only U.S. company capable of preventing **data breaches**, correct?
- A.** That's correct.



National Security Is Purview Of The United States

“It is . . . well-established that the judiciary owes some measure of deference to the executive in cases implicating national security, a uniquely executive purview.”

Ctr. for Nat. Sec. Stud. v. U.S. Dep’t of Just., 331 F.3d 918, 926–27 (D.C. Cir. 2003).

Conditional Divestitures



Conditional Android Divestiture

- Contingent structural relief
- If monopolized markets have not experienced substantial increase in competition in 5 years
- Incentivizes Google to adhere to Court's final remedy



android

Duration



“Longer Than We Would All Like”



Eddy Cue

Senior Vice President of Services
Apple

“**Time is the question** and how long does it take them, and that’s the only variable that **I don’t know the answer to. . . . If the question is, how long is it going to take** them to have an equal-size index, the answer is **probably longer than we would all like.**”



Will Take Time For Rivals To Gain Brand Recognition



Antonio Rangel, Ph.D.

Plaintiffs' Expert

Professor of Neuroscience, Behavioral
Biology, and Economics

Caltech

- Q.** Does it matter **how long a default has been in place**?
- A.** I think it will affect -- **yes, the behavior. . . . Google has been there for a long time**, there will be . . . a much higher likelihood that individuals are familiar with that search engine, brand familiarity. . . . **[D]efault effects are higher** for -- more familiar, and options with a higher brand, and that **the history of exposure** to the other default will affect also that likelihood of switch.



10-Year Remedy Is Appropriate



Gabriel Weinberg

Founder & CEO
DuckDuckGo

“You have to build out these indexes we’ve been talking about at scale and have them work as effectively as -- relative to Google. I think just building them is **going to take years** and then tuning them some years after that. . . . So I think a **ten-year time horizon is appropriate.**”



“Consistently Underestimated How Hard This Problem Is”



Nick Turley

Head of Product, ChatGPT
OpenAI

“I’ve consistently underestimated how hard this problem is. . . . But I think, you know, **five years from now**, we would have extreme clarity on whether or not that goal is achievable or not.”



Google Considered New Exclusive Contract (ACIA)

Must Have The Following To Receive Any Incentives

ACIA (Preferred Placement + Exclusivity + More Services)



- ❑ Device search exclusivity (DHS in sensitive Geos)
- ❑ Implementation requirements for QSB, CtoS, Discover



- ❑ DHS, -1, OOB hotword, & hardware affordance exclusivity (excl. 1P assistants)
- ❑ Gemini icon on DHS and LPP (excl. SS¹)

Under
Evaluatio
n



- ❑ Default browser & placed in hotseat
- ❑ All browser home pages, new tab, omniboxes set to Google

Android and the Partner Ecosystem

Evolving commercial agreements

Introduction to the **Android Commercial Incentive Agreement (ACIA)**

June 2024

CONFIDENTIAL // WORKING DRAFT FOR DISCUSSION -- Link to Y2 ACIA B2B Deck (DTRK 009)

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Ads Transparency Remedies



Advertising Remedies Will Improve Competition



Paul Vallez

EVP Strategic Business Development
& Product Partnerships
Skai

“It would allow us to make **more informed decisions** and ultimately **drive better performance**.”

* * *

“It would give us the ability to **make more informed recommendations**, and some of those **could lead to budget shifting**, but it’s not necessarily geared just for that.”



Advertising Remedies Give Advertisers More Control



Prof. Jerath

Plaintiffs' Expert

Arthur F. Burns Professor of Free and
Competitive Enterprise;
Chair of the Marketing Division

Columbia Business School

“And basically **they will help advertisers get more control – more information and control about the auctions**; and on the auctions, get more and better information about what’s happening with their own ad spend. And all of this will **help them make better decisions, including decisions about where to take that ad spend.**”



Advertising Remedies Will Help Advertisers

Search Ads Click Data in Ads Data Hub

last update: 2018-06-01, first proposed: 2017-10-11
by: Monica McArthur ([REDACTED]@google.com)
status: Approved
canonical link: go/adh-search-clicks

Objective

This document lays out the design for an initial prototype of importing search ads click events into Ads Data Hub BigQuery for one selected client. This includes the overall design, the changes that will be required for various parts of Ads Data Hub, how issues of specific concern such as privacy and data leakage will be addressed, and what the success criteria of the prototype will be.

Background

Ads Data Hub (ADH) is a project that allows customers to join their data with Google ads data derived from multiple sources (currently Doubleclick, AdWords GDN, YouTube Viral, and XFP/YouTube reserve logs, and match tables between external customer IDs and Biscotti IDs, external customer IDs and GAIA IDs, and device IDs). This functionality is intended to be a replacement for third party reporting and attribution use cases that utilize pixels (e.g. DMPs, ad servers, research vendors), as well as providing information on mobile app impressions that is not currently available.

The data is imported into BigQuery and made available for advertisers, agencies, and ad tech vendors to query using SQL, with aggregation and other privacy checks imposed on the final results (see go/full-circle-phase-1 for an outline). These checks protect the end user's privacy, leakage of Google's business data, and leakage of the customers' business data.

An overarching objective of ADH is to provide access to all ads data available within Google that can be done so while maintaining the privacy and business protection requirements. One source of data that has been requested by many customers is search ads data. However, as search ads data has additional sensitivity both for privacy and Google business data leakage, we did not add it along with the other, less-sensitive data sources.

In 2017 Q3, ADH received executive permission from the search team to create a pilot that would import search ads clicks for a single customer into ADH; if the pilot could prove usable while maintaining privacy and data leakage protections, we could then proceed with the project of making search ads data more generally available in ADH.

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GOOG-DOJ-33847929

Search Ads Click Data in Ads Data Hub

last update: 2018-06-01, first proposed: 2017-10-11
by: Monica McArthur ([REDACTED]@google.com)
status: Approved
canonical link: go/adh-search-clicks

C3

yes, this seems to be providing more data than we usually do. for example, we currently don't report position data to advertisers (we only report slot and avg. position). we also don't provide query_id, os, device height or width, user_id. i don't understand what advertisers would do with this data that would be beneficial for our users or Google, nor do I think that it is necessary for them to run their business.

I agree that with a lot more granularity of data, we run the risk of advertisers cherry picking or attempting to game our auction in other ways. It also makes it harder for us to pursue our pricing work, since advertisers can use this precise data to better understand the distribution and actively work against it.

However, I am not an expert on data sharing issues. + [REDACTED]@google.com is the expert on what kind of data we can share, so it will be important for him to sign off on the fields and aggregation levels.

Chris Monkman, 11/13/2017 05:40 PM

Publisher Remedies



Google's Existing Opt-Out Options Are Inadequate

Search (incl SGE) Publisher Controls

Updated April 12, 2024



(SFR) Proprietary & confidential (March 2024) Product Policy

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NEW: Aligned product recommendation

At the minimum, we should have our current product holding position be **Option 2 - do what we say, say what we do, but carefully**

1. **Silently update**, no public announcement
2. Make it clear that no-snippet enables pubs to opt out of **more than just display**.
3. **Do not say this opts them out of training**, as we don't want to get into the details of distinction between Gemini training and SGE training, and KITE/MUM, etc.
4. **Recommend not saying this opts them out of grounding**, as this is evolving into a space for monetization. Note: Post meeting, there might be flexibility here.
5. Instead lean into something closer to saying **it opts them out display that includes corroboration**, and will also opt them out of having snippets shown for blue links.

If aligned, as a **next step**, we will work on actual language and get this out before I/O

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Publishers Want Control Over Their Content

Search (incl SGE) Publisher Controls

Updated April 12, 2024



Ex No:

17050325

10/10/2024

10/10/2024

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4. Large publisher concerns are:

- "I don't want you to train on my valuable content w/out my permission and/or offering me \$"
- "I don't like that SGE will summarise my content and impact my traffic"
- "I want control over how Search displays my content"

NYT letter: "We understand [...] that if a publisher wants to opt-out of SGEs they would have to opt-out of all rich results or snippets. This presents an impossible choice for publishers, as opting out of snippets and rich results would have a detrimental impact on overall search visibility."

Ad Week article: "Google's Gen AI Search Threatens Publishers With \$2B Annual Ad Revenue Loss"

- ### 4. Publishers are not happy with the current state of opt-outs for SGE, and impacting snippets and ranking is considered a forced choice

Self-Preferencing



Self-Preferencing: Section V.B.

“Google must not use its ownership and control of Android, or any other Google product or service to:”

Play Store

Circle to Search

Search Access Points

On Device AI

Grounding

Investment Notification

Anticircumvention



Remedies Must Prevent Circumvention



Tasneem Chipty, Ph.D.

Plaintiffs' Expert

Founder & Managing Principal

Chipty Economics, LLC

“And I would expect that in the future when the remedies are adopted, whatever they might be, **I would expect that Google look for alternative ways to protect its lucrative general search monopoly.**”



Google Has Incentive To “Work Around The Remedy”



Gabriel Weinberg

Founder & CEO
DuckDuckGo

“Because as soon as you have the remedies, now Google has so much incentive and, for all practical purposes, **infinite resources to try to work around the remedy** and that’s what we have been seeing in Europe.”

Conclusion



Doing Too Little Preserves The Status Quo



Tasneem Chipty, Ph.D.

Plaintiffs' Expert

Founder & Managing Principal

Chipty Economics, LLC

- Q.** You were asked about the risks of doing too much in a remedy. Can you opine for a moment about what the **risks of doing too little** might be?
- A.** I think that's obvious. Risks of doing too little would **preserve the status quo** and allow a dominant firm to continue to benefit from its past conduct and potentially further that into the future.

**“Google is a monopolist,
and it has acted as one to
maintain its monopoly.”**

August 5, 2024 Memorandum Opinion at 4.