

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

United States of America, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

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

HON. AMIT P. MEHTA

State of Colorado, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

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

HON. AMIT P. MEHTA

**PLAINTIFFS' SECOND STATUS REPORT AS TO
THE ENFORCEMENT OF AND GOOGLE'S COMPLIANCE WITH
THE FINAL JUDGMENT**

Pursuant to the Court's request at the hearing held on May 5, 2026, Hr'g Tr. 47:14–49:22 (May 5, 2026), and the Minute Entry of that same date, Plaintiffs in the above-captioned cases jointly file this Status Report.¹

¹ During the May 5 hearing, the Court requested that this Status Report be filed by September 18, 2026. By Minute Order dated September 11, 2026, the Court set a status conference also for September 18. Plaintiffs are filing this Status Report before September 18, so that the Court may have the opportunity to review it in advance of the status conference.

I. INTRODUCTION

Section VII.E requires Plaintiffs, with input from the Technical Committee (“TC”), to file a status report within 90 days of the Effective Date of the Final Judgment to update the Court “as to the enforcement of and Google’s compliance with this Final Judgment,” with additional status reports due on future dates to be set by the Court.² ECF No. 1462, § VII.E [hereinafter “Final J.”]. Plaintiffs filed the first such report on May 4, 2026 (“First Status Report”). ECF No. 1512.

Pursuant to Section VII.A, on May 9, 2026, this Court appointed the final two members of the TC, which put all five members of the TC into place. ECF No. 1517. In the time since, the TC Members worked diligently on the substantive work of implementing the Final Judgment and ensuring Google’s compliance therewith.

Part II below provides an update on TC operations. Part III describes ongoing efforts by Plaintiffs and the TC to implement and enforce the Final Judgment. Part IV describes Google’s compliance with the Final Judgment to date, which also reflects information provided by Google’s counsel and efforts by Plaintiffs and the TC to monitor Google’s compliance.

II. UPDATE ON TC OPERATIONS

In its remedies opinion, the Court stated that the six-year term of the Final Judgment “accounts for the court’s expectation that it will take one year to establish the [TC] and the processes necessary for execution.” ECF No. 1435 at 219 [hereinafter “Rem. Op.”]. Since the First Status Report, the TC has continued to establish such processes and build the organization needed to carry out its obligations under the Final Judgment.

² Unless otherwise stated, all references to “sections” herein are to sections of the Final Judgment.

A. Appointment of Remaining Two TC Members

On January 21, 2026, this Court appointed the first three members of the TC, who compose the Standing Committee Members and were required by the Final Judgment to select the two remaining members of the TC. ECF No. 1474; Final J. § VII.A.3.c. Pursuant to Section VII.A.3.c, the Standing Committee Members identified to Plaintiffs and to Google their proposed designees to the TC on May 1, 2026. No party objected to either of the designees, and on May 9, 2026, the Court appointed the final two individuals. ECF No. 1517. As of June 15, 2026, all five members of the TC (“TC Members”) were fully onboarded.

B. Organizational Plan

Pursuant to the TC Services Agreement, on May 14, 2026, the TC presented its Organizational Plan to Plaintiffs. The organizational plan specifies the manner in which the TC will discharge its duties and obligations under the Final Judgment, including to: (1) investigate, mediate, report, respond to, or recommend resolution of third-party complaints concerning Google’s compliance with the Final Judgment, including how the TC will fulfill its obligations under the Final Judgment; (2) provide information regarding Google’s compliance with the Final Judgment to Plaintiffs; (3) account for the TC’s time and expenses; and (4) discharge, address, process, consider, or respond to any other operational issue necessary or appropriate for the TC to fulfill its duties and obligations under the Final Judgment. Plaintiffs promptly approved the plan on May 18, 2026.

C. TC Budget, Notices to Hire, and Staffing

At the time the TC presented Plaintiffs with the Organizational Plan, the TC also presented Plaintiffs with a proposed annual budget covering this first year of the TC’s operations through January 31, 2027 (“Ramp-Up Budget”). The TC further presented and discussed its staffing plan for the first year of the TC’s operations through January 31, 2027 (“Ramp-Up

Year”) and presented Plaintiffs with formal notices to hire staff for the TC (“TC Staff”). On May 18, 2026, Plaintiffs approved the hiring of TC Staff and the Ramp-Up Budget, and the TC provided Google with copies of both the budget and the notices to hire TC Staff.

On May 22, 2026, Google objected that it had not received information sufficient for it to evaluate the reasonableness of the funds requested in the Ramp-Up Budget associated with the staff members the TC intended to hire. Following further correspondence and meet and confers, Google agreed to fully fund the Ramp-Up Budget, including personnel-related costs and expenses, while the Parties submitted their dispute to the Court. ECF No. 1524 at 2. The TC received those funds on June 16, 2026.

At a hearing on June 23, 2026, the Court directed Plaintiffs to provide certain additional information to Google and ordered the Parties to file a Joint Status Report (“JSR”) on any outstanding issues by July 7, 2026. Plaintiffs provided the additional information to Google, and Google asked further questions. The Parties were able to sufficiently address remaining issues such that a JSR was not needed at that time.

Upon receiving funding for the Ramp-Up Budget, the TC began to execute its hiring plan. As the Ramp-Up Budget reflected, the TC’s hiring plan anticipates hiring staff progressively across the Ramp-Up Year. The TC is continuing to hire personnel pursuant to the staffing plan to meet the TC’s needs as workloads increase and Plaintiffs and the TC progress in implementing the remedies.

D. Source Code Agreement

The Final Judgment provides that “[t]he TC shall have access to Google’s source code and algorithms, subject to a confidentiality agreement, as approved by Plaintiffs” (“Source Code Agreement”). Final J. § VII.A.7.d. The agreement with Google is to be signed by each TC Member as well as any TC Staff with access to such source code and algorithms.

Following several months of negotiations and discussions with Google, on September 11, 2026, Plaintiffs notified the Court about a dispute that had arisen over the Source Code Agreement that Plaintiffs have approved pursuant to Section VII.A.7.d. The Parties filed a JSR on this dispute on September 16, 2026. ECF No. 1549. As discussed in that JSR, promptly finalizing and signing the Source Code Agreement and getting the TC the required access is critical for continuing progress in implementing the remedies. Plaintiffs will be prepared to address at the September 18 status conference any questions the Court may have regarding the issues raised in the JSR.³

E. Protected Information Access and Security Plan

Under the Confidentiality Agreement signed by TC Members pursuant to Section VII.A.7.d, the TC was required to present to Plaintiffs a Protected Information Access and Security Plan (“Security Plan”). This plan was subject to approval by Plaintiffs prior to its implementation. In addition, a copy was to be provided to Google to give them the ability to object and raise such objections with the Court.

Having the Security Plan in place and implemented was critical for the TC to be able to continue work on the remedies and meet its obligations under the Final Judgment. The plan specifies how the TC will meet its record-keeping and notification obligations, maintain the security of information gathered by the TC, and comply with applicable laws and regulations. Once drafted, finalizing the plan was the next time-sensitive step, as the TC could not proceed with engaging service providers and acquiring key data systems until the plan was deemed final

³ Shortly after the JSR on this issue was filed, Google filed a supplemental status report. *See* ECF No. 1550. Plaintiffs will be prepared to address this report as well during the September 18 status conference.

and ready to implement. In fact, until then, the TC was unable to acquire and put in place the systems to access, receive, review, analyze, or maintain Google data and other information.

On July 14, 2026, the TC timely presented the Security Plan to Plaintiffs. Following review, discussion, and revision, Plaintiffs approved the Security Plan and promptly provided a copy to Google on July 21, 2026, initially requesting any objections by August 4, 2026, to keep the process moving.

The TC has expressed concern regarding the time Google subsequently expended in reviewing the Security Plan, which remained pending for another three weeks. The Parties held a meet and confer on July 31, 2026, and later that day Google requested a call between the TC and a Google subject-matter expert to discuss the Security Plan. Mindful of the time sensitivity, on Monday, August 3, 2026, Plaintiffs agreed for such a call to take place that same week and agreed to move the objection deadline to August 6, 2026. After Plaintiffs did so, however, Google advised that its chosen subject-matter expert was out of the country for the week. Plaintiffs pushed for a call still to take place the week of August 3 or early the next week, requesting that Google provide an alternate subject-matter expert if the original person was not available. Google did not provide call times in that range or an alternate; instead, on August 10, 2026, Google offered call availability for its preferred person for several days later, on August 13 and August 14, 2026. Plaintiffs took the first time offered. After the call, Google did not raise any other concerns with the Security Plan.

On August 19, 2026, Plaintiffs sent Google an updated Security Plan that reflected certain points that were raised during the Parties' meet and confers and discussed during the call with Google's subject-matter expert. Plaintiffs requested that Google provide any objections to

the modifications by August 24, 2026, and further noted that absent specific objections, Plaintiffs and the TC would consider the Security Plan to be final and would begin fully implementing it.

On August 25, 2026, Google responded but did not specify any objections. Instead, Google requested that the TC begin to execute the proposed Security Plan while continuing to build out and draft components of the plan, with the idea that at some later point in time, the TC would issue an updated proposed plan for Google's review. On August 27, 2026, Plaintiffs advised that they did not agree, as Google's approach would effectively keep the Security Plan in limbo and subject to an indefinite objection period, and the TC had already provided sufficient information in its plan. Plaintiffs further advised that they considered the Security Plan to be final and that the TC would begin implementation, noting that if Google has a specific concern and a specific proposed resolution going forward, Google may always raise them and the TC and Plaintiffs will consider them.

Google did not respond. Thereafter, the TC began to implement the Security Plan and engage with service providers to put necessary systems in place.

F. Issues Raised at July 14, 2026 Status Conference

At the Court's request, on July 8, 2026, the Court held a call with the five TC Members. During the Status Conference held on July 14, 2026, the Court identified to the Parties three issues that the TC Members had raised to the Court as impacting their hiring plans:

1. gaining greater clarity regarding the restriction on post-TC employment set forth in Section VII.A.2.c.;
2. providing a prohibition against compelled testimony to TC staff; and
3. providing indemnification by Google to TC staff.

Hr'g Tr. (July 14, 2026) at 4:06–7:11. The Court encouraged the Parties to work to resolve these issues "as quickly as possible." *Id.*

Thereafter, the Parties held a number of meet and confers and exchanged multiple rounds of proposals on each of these issues, as noted in JSRs to the Court filed weekly between July 22 and August 12, 2026. ECF Nos. 1533, 1537, 1539, and 1542. As part of that process, Plaintiffs regularly conferred with the TC to ensure that the TC's concerns were addressed and the TC approved the proposals presented to Google. On August 14, 2026, Plaintiffs, in consultation with the TC, and Google presented agreed-upon proposals to the Court regarding the first and second issues above. ECF No. 1542. The Court entered an order regarding the same on August 25, 2026. ECF No. 1543.

The third issue above relating to indemnification is more complex. As discussed in additional JSRs filed on August 28 and September 11, 2026, Plaintiffs are continuing to work with the TC to gather relevant information and develop a proposal to address the TC's concerns on indemnification. ECF Nos. 1544, 1548. The next JSR on this issue is due on October 2, 2026, and the Parties will continue to meet and confer as needed.

III. IMPLEMENTING THE FINAL JUDGMENT'S REMEDIES

A. Order of Operations and Confidentiality

Since the First Status Report, the Parties have worked to develop processes and procedures for submissions to the Court on substantive remedies pursuant to the Final Judgment. On May 1, 2026, the Parties filed a JSR on certain disputes relating to confidentiality. ECF No. 1511. During a hearing on May 5, 2026, the Court requested that the Parties submit a proposal regarding an "order of operations" framework for recommendations and complaints under the Final Judgment, to give context to the Parties' disputes. *See, e.g.*, Hr'g Tr. 35:22–38:15, 40:18–41:10 (May 5, 2026).

On May 20, 2026, the Parties filed a JSR with the Court that presented their proposals in Appendix A to that JSR ("May 20 JSR Appendix"). ECF Nos. 1520, 1520-1. Those proposals

were agreed upon by the Parties, except for a few discrete disputes. ECF No. 1520 at 2–3. On May 29, 2026, the Court ordered the Parties to “adopt all of Plaintiffs’ proposed terms (or lack thereof)” as set forth in the May 20 JSR Appendix, except as to those provisions for which the Parties were ordered to adopt the Court’s language. ECF No. 1521 at 7 & Appendix.

The May 20 JSR Appendix sets forth the order of operations, content requirements, and confidentiality restrictions that apply to all Recommendations.⁴ ECF No. 1520-1 at Part I.A–C. The order of operations includes processes for a review and objection period for Google and for the submission of any outstanding objections to the Court. ECF No. 1520-1 at Part I.A. For purposes of the timeline to be applied to the order of operations, the Parties agreed that Recommendations may generally be divided into three categories of increasing complexity: Category 1, Category 2, and Category 3. The Parties have agreed to timelines for Category 1 and Category 2 Recommendations. ECF No. 1520-1 at Part I.A (Category 1); ECF Nos. 1528-2, 1529 (Category 2). The Parties are discussing the timeline for Category 3 Recommendations, which are more complex. While the orders of operations set outside deadlines for these processes, Plaintiffs and the TC will strive to move as quickly as possible if actions can be taken more quickly, and hope that Google will do the same to avoid needless delay in implementing the remedies.

B. Syndication Remedies (Sections V.B and VI.B)

Sections V.B and VI.B require Plaintiffs and the TC, with input from Google, to create and submit to the Court template search syndication and Search Text Ads⁵ syndication licenses

⁴ “Recommendations” was defined to mean all recommendations, decisions, or other submissions pursuant to the Final Judgment as to which Google has a right to object under Section VII.A.7.k, excluding those to certify or recertify Qualified Competitors (which were separately defined). ECF No. 1520-1 at 1 n.1.

⁵ The term “Search Text Ads” is defined in Section IX.Y of the Final Judgment.

(“Recommended Syndication Template”). Pursuant to the Court’s June 26, 2026 order, Plaintiffs must file the Recommended Syndication Template by October 6, 2026. ECF No. 1529. The Recommended Syndication Template is subject to the May 20 JSR Appendix and to the order of operations and timing for Category 2 Recommendations. ECF Nos. 1520-1, 1528-2, 1529.

In developing the Recommended Syndication Template, Plaintiffs and the TC affirmatively sought input from Google. Pursuant to Section VII.A.7.c, the TC sent two demand letters to Google on issues related to search syndication and Search Text Ads syndication. The first letter, sent on April 27, 2026, sought Google’s current syndication agreements and documentation of its current syndication services and partners. In response, Google made partial productions to the TC on May 1 and May 8, 2026. On July 31, 2026, the TC sent Google a second demand letter, which sought documents that remained missing from Google’s May productions as well as updated documentation of its syndication services and agreements. Plaintiffs and the TC reviewed the documents and information that Google did provide and engaged with third parties on issues related to syndication.⁶

On August 31, 2026, Plaintiffs and the TC provided Google with the Recommended Syndication Template, including the Recommendation Statement and Basis Statement. On September 8, 2026, Google sent Plaintiffs and the TC a letter requesting additional information concerning various aspects of the template. On September 15, 2026, Plaintiffs responded to Google’s requests.

Google is required to provide Plaintiffs and the TC with any objections by September 29, 2026, after which the Parties will meet and confer. Plaintiffs will submit the Recommended

⁶ The Basis Statement to be submitted to the Court as part of the Recommended Syndication Template will expand on the input received from Google as well as information obtained from third parties.

Syndication Template and any outstanding objections to the Court on October 6, 2026, and the Parties will submit a JSR on any outstanding objections by October 14, 2026.

C. Data Sharing Remedies (Section IV)

Pursuant to Section IV.B, Google is required to make certain User-side Data available to Qualified Competitors.⁷ To that end, Section IV.C.3 requires Plaintiffs and the TC, with input from Google, to create and submit to the Court a template license governing the use of data shared pursuant to Section IV. Section IV.C.1 requires “Plaintiffs, in consultation with the TC, [to] promptly determine the appropriate User-side Data privacy and security safeguards to be applied before Google shares the data,” after which point Google has six months to implement the safeguards. Final J. § IV.C.1.

1. Template Web Search Index and User-side Data Sharing License

Section IV.C.1 requires Plaintiffs and the TC, with input from Google, to create and submit to the Court a template for a Web Search Index and User-side Data sharing license (“Recommended Index and Data Sharing Template”).⁸ Final J. § IV.C.1. Pursuant to the Court’s Minute Order dated August 3, 2026, Plaintiffs must file the Recommended Index and Data Sharing Template by October 27, 2026. The Recommended Index and Data Sharing Template is subject to the May 20 JSR Appendix and to the order of operations and timing for Category 2 Recommendations. ECF Nos. 1520-1, 1528-2, 1529.

As they work to develop the Recommended Index and Data Sharing Template, Plaintiffs and the TC have affirmatively sought input from Google. Pursuant to Section VII.A.7.c, the TC

⁷ The terms “Qualified Competitor” and “User-side Data” are defined in Sections IX.V and IX.EE, respectively.

⁸ The term “Web Search Index” is defined in Section IX.FF.

sent two demand letters to Google, one on July 22, 2026 for information related to User-side Data, and another on August 7, 2026, for information related to the Web Search Index.

Google has advised the TC that it is withholding certain information responsive to the TC's demands concerning User-side Data pending execution of the Source Code Agreement. In its August 14, 2026, response to the TC's July 22 demand letter, Google referenced that the Parties were continuing to develop a protocol by which the TC would receive access to Google's source code. Google stated that once that protocol, which is part of the Source Code Agreement, is finalized, Google will produce withheld information.

In the interim, Plaintiffs and the TC are continuing to gather and review information on these topics and engage with third parties.⁹ Plaintiffs are scheduled to provide the recommendation to Google on September 21, 2026, which will begin the review and objection period. The deadline for Plaintiffs to submit the Recommended Index and Data Sharing Template and any outstanding objections to the Court is October 27, 2026, and the Parties must then submit a JSR on any outstanding objections by November 4, 2026.

2. User-side Data Privacy and Security Safeguards

Contemporaneous with developing the Recommended Syndication Template and Recommended Index and Data Sharing Template, the TC has been actively assessing issues related to User-side Data privacy and security safeguards. For example, on June 24, 2026, the TC issued demand letters to Google seeking to interview two named individuals on these issues, and on July 27, 2026, the TC conducted a joint interview. The TC is also assessing these issues in connection with developing the recommended templates.

⁹ As with the Recommended Syndication Template, the Basis Statement to be submitted to the Court as part of the Recommended Index and Data Sharing Template will expand on the input received from Google as well as information obtained from third parties.

The TC's ability to continue making meaningful progress on issues related to User-side Data privacy and security safeguards is subject to finalizing and implementing the Source Code Agreement. As part of fulfilling its broader obligations under the Final Judgment, and for purposes that extend beyond the Recommended Index and Data Sharing Template discussed above, the TC needs to be able to understand Google's mechanisms for securing and operating critical system components. Being able to access and observe those systems in the first instance is a necessary predicate to that effort: Because those systems fall within the scope of the Source Code Agreement, the TC cannot access them until after the agreement and related processes are in place.

In addition to withholding information responsive to the TC's July 22 demand letter, during the July 27 interview referenced above, the TC pointed out redactions in certain Google documents that the TC had received. Google's counsel responded that the redacted information was being withheld pending execution of the Source Code Agreement. Plaintiffs will work to get the agreement in place as expeditiously as possible following resolution of the JSR on point. As noted above, however, the delay caused by the lack of a signed Source Code Agreement, and access to this information, continues to delay the TC's work in implementing the remedies.

D. Qualified Competitors (Section IX.V)

To benefit from the Court's syndication and data sharing remedies, an entity must become a Qualified Competitor under the Final Judgment. To do that, the entity must: (1) meet Plaintiffs' approved data security standards, as recommended by the TC; (2) agree to regular data security and privacy audits by the TC; (3) make a sufficient showing to Plaintiffs, in consultation with the TC, of a plan to invest and compete in or with the general search engine and/or Search Text Ads markets; and (4) pose no risk to the national security of the United States. *See* Final J. § IX.V.

Plaintiffs and the TC are currently working on establishing the procedures for certifying Qualified Competitors. Such procedures will include, for example, determining the certification criteria, creating the application process, identifying the information that must be provided and how it will be evaluated, and developing processes for managing Qualified Competitor audits. Once Plaintiffs and the TC have worked through all these elements, information regarding the process and procedures will be made publicly available.

E. Search Text Ads Auction Remedy (Section VI.A)

Under the Final Judgment, “Plaintiffs [must] submit a proposal to the Court, informed by the [TC]’s views, by which Google [must] periodically provide [to] the [TC] and Plaintiffs a report outlining all changes to its Search Text Ads auction meeting certain parameters and, for each change, (1) Google’s public disclosure of that change or (2) a statement why no public disclosure is necessary.” Final J. § VI.A.

The TC has begun obtaining the necessary information to bring its expertise to bear on this issue. On July 21, 2026, the TC sent a demand letter to Google for information related to its Search Text Ads auction. Google provided initial responses on September 8, 2026, and the TC is currently assessing those responses.

For the TC’s work on this remedy to be completed, it is again imperative that the Source Code Agreement be finalized and signed. The TC cannot fulfill its obligations under Section VI.A without access to data from Google’s Search Text Ads auction, and the TC cannot gain such access until the Source Code Agreement is in place. Moreover, although Google has asserted to the TC that Google has not made any material changes to the auction mechanism, without such access, the TC is unable to verify that claim.

In the interim, the TC will continue to seek additional information related to the Search Text Ads auction remedy.

IV. GOOGLE’S COMPLIANCE WITH THE FINAL JUDGMENT

A. Google Complaint Website (Section VII.C.2.a)

The Final Judgment provides that “[t]o facilitate the communication of complaints and inquiries by parties, the Compliance Officer shall place on Google’s website, in a manner acceptable to the Plaintiffs, the procedures for submitting complaints.” Final J. § VII.C.2.a. In the time since the First Status Report, the Parties have continued to work cooperatively regarding Google’s proposed mockup of the complaint website, including exchanging revisions and proposals. On September 15, 2026, Plaintiffs responded to Google’s most recent proposal and offered to meet and confer regarding one outstanding issue during the week of September 21, 2026. In the event the Parties are unable to reach agreement, they will reach out to the Court for assistance.

In parallel with the steps above, Google has also continued working on setting up complaint management processes necessary to address any such complaints.

B. Responses to Demand Letters

As referenced in Part III above, the TC has issued multiple demand letters to Google pursuant to Section VII.A.7.c, seeking interviews and information. To date, Google employees have participated in multiple interviews with the TC, including:

- July 27, 2026 interview of two Google research scientists on topics related to user-side data and privacy;
- August 6, 2026 interview of a Technical Program Manager on topics related to source code and protected information access/ security procedures;
- August 13, 2026 interview of a Security Engineering Director on topics related to source code and protected information access/ security procedures;
- August 14, 2026 interview of a Google VP on topics related to access to Google’s source code and user data; and

- August 24, 2026 interview of a Search Engineering Director on topics related to user-side data and privacy.

Google has also responded to multiple requests for information, including:

- April 27, 2026 demand letter requesting information related to search and Search Text Ads syndication, to which Google responded on May 1, 2026 and submitted additional information on May 8, 2026.
- July 21, 2026 demand letter requesting information related to Google's Search Text Ads auction, to which Google responded on September 8, 2026.
- July 22, 2026 demand letter requesting information related to Google's user-side data, to which Google responded on August 14 and September 11, 2026. In its August 14 response, Google also identified three individuals as being authorized to meet with the TC: two senior ranking engineers as being knowledgeable about the Glue and RankEmbed models; and one senior logs engineer knowledgeable about the logs that feed into Glue and RankEmbed.
- July 31, 2026 follow up and additional demand letter requesting information related to search and Search Text Ads syndication, to which Google responded on August 14, 2026. Google additionally submitted draft template syndication licenses to the Technical Committee on August 10 and August 19, 2026.
- August 7, 2026 demand letter requesting information related to Web Search Index information, to which Google responded in part on August 21, 2026 and submitted additional information on August 28, 2026. In its August 28 response, Google also identified two individuals as being authorized to meet with the TC: a senior engineering director knowledgeable about Google's spam system, who was also identified in Google's August 14 response; and a VP knowledgeable about Google's Web Search Index, whom the TC previously interviewed on August 14, 2026 (reflected above).

C. Other Efforts

Google has been working to prepare a remote environment by which the TC can access highly sensitive data, including but not limited to algorithms and user data, pending finalization and signing of the Source Code Agreement. This has involved the work of dozens of Google personnel, including employees from a number of teams housed within Google's central infrastructure organization.

Google has also continued its preparatory work to comply with the data-sharing and syndication requirements in Sections IV–VI of the Final Judgment.

Dated: September 17, 2026

Respectfully submitted,

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