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 [redacted]
STATE OF COLORADO, *et al.*, Plaintiffs, v. GOOGLE LLC, Defendant.	Case No. 1:20-cv-03715-APM HON. AMIT P. MEHTA [redacted]

PLAINTIFFS' JOINT RECOMMENDATION
FOR TEMPLATE SEARCH AND SEARCH TEXT ADS
SYNDICATION LICENSE AGREEMENT

I. INTRODUCTION

Pursuant to Sections V and VI.B of the Final Judgment in the above-captioned cases, Plaintiffs and the Technical Committee ("TC"), with input from Google, are required to create and submit to the Court templates for a search syndication license and a Search Text Ads syndication license. ECF No. 1462 at §§ V, VI.B [hereinafter Final J.]. Search syndication is critical to the success of the Court's remedies: Because "[i]t will take time for a Qualified Competitor to build its own search index and the capacity to deliver high-quality search results," Qualified Competitors need remedial search syndication to compete in the short term, particularly when answering long-tail, local, and fresh queries. ECF No. 1435 at 170–71 [hereinafter Rem. Op.]. Search Text Ads syndication is similarly important, as it enables Qualified Competitors to monetize high-quality ads from the start. *Id.* at 183. Under the Court's Minute Order of October 6, 2026, the template licenses are to be submitted to the Court by October 9, 2026.

Plaintiffs hereby submit this Recommendation and accompanying template, provided as Attachment 1 hereto, that provides license terms for both search syndication and Search Text Ads syndication ("Recommended Template").[1] The Recommended Template is the culmination of

[1] Google has requested that the entirety of the Recommended Template be redacted for purposes of this filing to permit Google additional time to determine what redactions it believes are necessary. Although Plaintiffs believe that minimal redactions to certain financial terms are necessary pending resolution of Google's objections, Plaintiffs understand that Google believes more extensive redactions are necessary. To accommodate Google's concern, Plaintiffs have agreed to file the entire Recommended Template under seal in this submission, with the understanding that Google will provide reasonable, tailored proposed redactions to Plaintiffs on October 13, 2026. In the event the Parties cannot agree on a redacted version to file on that date, Plaintiffs propose that the Parties file a short Joint Status Report on October 14, 2026, with competing redacted versions if necessary. In either event, the factors set forth in *United States v. Hubbard*, 650 F.2d 293, 317-22 (D.C. Cir. 1980), will be addressed in the filing.

In discussing proposed redactions, Plaintiffs and Google acknowledged the Court's comments during the status conference held on September 18, 2026, regarding potential

over five months of work by Plaintiffs and the TC, including comprehensive contractual analysis; third-party engagement; multiple demand letters to Google seeking relevant information and Google's input on syndication terms; and engaging with Google (including Google technical staff) throughout a five-week review and objection period. The template license further takes into account the practical commercial realities of implementing and enforcing the Court's syndication remedies. *See* ECF No. 1436 at 212 (discussing need to establish "practical workings" of the Final Judgment) [hereinafter Final J. Op.].

The Recommended Template is subject to the terms that the Court ordered the Parties to adopt for Recommendations as set forth in Appendix A to the Parties' Joint Status Report filed on May 20, 2026 ("May 20 JSR Appendix"), ECF Nos. 1520-1, 1521, as well as to the order of operations and timing for Category 2 Recommendations, ECF Nos. 1528-2, 1529.[2] As discussed in Part II below, the Parties have complied with the process provided for in the order of operations and timing for Category 2 Recommendations. Pursuant to that process and the Court's October 6 Minute Order, the Parties will submit a Joint Status Report on outstanding objections to the Court by October 16, 2026.

The May 20 JSR Appendix requires that each Recommendation include at least "a statement clearly presenting the recommendation being made" ("Recommendation Statement") and "a statement regarding the basis for the recommendation" ("Basis Statement"). May 20 JSR

Qualified Competitors having access to an unredacted version of the Recommended Template once it is final. Hr'g Tr. 52:12–53:07 (Sept. 18, 2026). Plaintiffs and the TC believe that is a critical next step in the remedies process. Plaintiffs therefore also understand that the Parties will, in advance of any hearing on Google's objections, meet and confer regarding access to an unredacted version of the Recommended Template by potential Qualified Competitors.

[2] "Category 2 Recommendations" has the meaning set forth in the May 20 JSR Appendix.

Appendix ¶ 1. The Recommendation Statement and Basis Statement for the Recommended Template are presented below in Parts III and IV, respectively.

II. ENGAGEMENT PURSUANT TO THE ORDER OF OPERATIONS

In addition to the input and materials discussed in the Basis Statement below, the attached Recommended Template reflects engagement between Plaintiffs, the TC, and Google over the last five weeks. On August 31, 2026, Plaintiffs and the TC provided a recommendation statement, basis statement, and template license to Google. Under the May 20 JSR Appendix, Google then had the opportunity to request additional information regarding the template license, to the extent such information exists, was provided to the TC, and Google had a good faith belief that such information was necessary to comply with or exercise its right to object under the Final Judgment. ECF Nos. 1520-1, ¶ 6(b). On September 8, 2026, Google submitted approximately 100 requests to Plaintiffs and the TC, as well as requested a live discussion between Google employees and the TC to narrow areas of disagreement and improve Google's factual understanding of the template license.

On September 15, 2026, Plaintiffs and the TC responded to Google's requests for additional information. Thereafter, Google requested three calls between Google employees and the TC on three different categories of topics, which calls were held on September 25 and September 29, 2026.

After the third call on September 29, Google submitted to Plaintiffs and the TC approximately 240 objections across the template license. The Parties held a meet and confer on September 30, 2026, and Plaintiffs and the TC reviewed and considered Google's objections. To the extent Plaintiffs and the TC believed it was appropriate to do so, they updated the template license to address Google's objections. Plaintiffs provided that document, attached here as the Recommended Template, to Google on October 4, 2026. The Parties then held another meet and

confer on October 5, 2026, during which they discussed certain updates made to the template license in response to Google's objections, as well as other objections that Google had provided.

At Google's request, following the October 5 meet and confer, Plaintiffs requested extensions of (1) the deadline to file the Recommendation, Recommended Template, and Google's objections, to October 9, 2026; and (2) the deadline to file the Joint Status Report, to October 16, 2026, which extensions the Court granted. ECF No. 1558; Minute Order dated October 6, 2026. Google advised that the additional time requested would allow it to provide updated objections for Plaintiffs to submit with the Recommendation and Recommended Template.

On October 9, 2026, Google submitted to Plaintiffs and the TC updated objections to the Recommended Template. A copy of those approximately 220 objections is attached hereto as Attachment 2. Consistent with the order of operations, the objections in Attachment 2 "identify any part(s) of the [Recommended Template] as to which an objection remains unresolved" and are "limited to a brief statement for each objection identifying the objection itself." ECF No. 1528-2 at 3. Per the order of operations, the objections "[do] not contain bases or arguments offered in support of the objection, which may be presented in the Joint Status Report."[3] *Id.*

The Parties will continue to meet and confer as appropriate over the next several days and will submit a Joint Status Report on any outstanding objections to the Court by October 16, 2026.

[3] As required by the order of operations, Google's September 29 objections and October 9 updated objections "identif[ied]: (a) the part(s) of the Recommendation to which Google objects; and (b) for each such part, (i) the basis for the objection, and (ii) Google's proposed resolution and the basis therefor." ECF No. 1528-2 at 3. Per the order of operations, Attachment 2 does not include Google's basis and proposed resolution, which Google may present in the forthcoming Joint Status Report.

III. RECOMMENDATION STATEMENT

Plaintiffs, together with the TC, recommend that the Court adopt the Recommended Template, which is incorporated by reference into this Recommendation Statement, in satisfaction of the Final Judgment's requirement to create and submit template search syndication and Search Text Ads syndication licenses. Final J. §§ V, VI.B.

The Recommended Template is designed as a single, modular syndication license template that addresses both search syndication and Search Text Ads syndication remedies under Sections V and VI.B of the Final Judgment. This combined approach is intended to reflect Google's commercial syndication agreements, many of which include both search syndication and ads syndication, while preserving necessary flexibility for Qualified Competitors (as that term is defined in Section IX.V of the Final Judgment). Under the proposed template, for example, Qualified Competitors may elect to receive all remedial syndication services or only a subset, with terms reflecting the specific syndication services a Qualified Competitor selects. *See* Attach. 1, Ex. B.

The Recommended Template is further intended to maximize the operational efficiency of implementing these licenses. It is drafted to apply equally to any Qualified Competitor, including providers of General Search Engines, Search Text Ads, or GenAI Products. Similarly, the Recommended Template is drafted to effectuate processes related to Qualified Competitor certification, enforcement, and compliance monitoring without needing to amend or modify the template on an ongoing basis. Beyond the terms in the Recommended Template, Google remains entitled to propose additional terms related to Search Text Ads syndication as necessary to guarantee ad quality, protect advertisers, and prevent ad misuse, and Qualified Competitors will remain entitled to reject these proposed additional terms. *See* Final J. § VI.B.11. Plaintiffs additionally propose that Qualified Competitors may negotiate modified or additional terms to

their remedial syndication agreement(s) with Google, so long as (a) Plaintiffs and the TC confirm in advance that such terms comply with the Final Judgment and (b) Google's acceptance or rejection of any terms proposed by Qualified Competitors does not violate the Final Judgment, including the requirement that Google provide syndication licenses to Qualified Competitors on a non-discriminatory basis. *See* Final J. § V.B.3. Plaintiffs' expectation is that Google would accept any edits regarding the Signatory's obligations with respect to Plaintiffs or the TC that do not directly impact Google's obligations pursuant to the agreement.

Under the Final Judgment, the template syndication license must include various terms to foster competition by Qualified Competitors, including terms setting out, e.g.: (1) the pricing and methods for delivering syndication services to Qualified Competitors; (2) the latency, reliability, and performance of syndication made available to Qualified Competitors; (3) the terms over which Qualified Competitors can display, use, and format syndicated search results and Search Text Ads; and (4) the information from Qualified Competitors that Google may receive, retain, and use while providing remedial syndication services to Qualified Competitors. Final J. §§ V, VI.B. Where the Final Judgment sets explicit requirements, those requirements are reflected within the main body of the Recommended Template. Where the Final Judgment demands terms no less favorable than Google's commercial agreements—or explicitly pins terms to Google's commercial agreements, *see* Final J §§ V.B.7, VI.B.6—the Recommended Template is supplemented with appropriate language in exhibits derived from the TC's analysis of Google's commercial syndication agreements, *see, e.g.*, Attach. 1 at Exs. B–C.

The Recommended Template does not presently include a recommended tapering schedule. Under Section V.B.4 of the Final Judgment, Qualified Competitors' use of Google's search syndication must be capped at 40% of annual U.S. queries for the first year, with

syndication in later years subject to a tapering schedule that "will be determined by the Court upon consultation with Plaintiffs and the Technical Committee in a manner that facilitates competition while incentivizing Qualified Competitors to move promptly to become independent of Google." In the Recommended Template, Plaintiffs and the TC have capped syndication at 40% of annual U.S. queries for the first year and propose submitting a supplemental recommendation regarding the syndication tapering schedule at a later date, to be informed by ongoing evaluations of Qualified Competitors' use of remedial syndication licenses within the first year and any additional instructions this Court may provide.

IV. BASIS STATEMENT

As described below, in developing the Recommended Template, Plaintiffs and the TC affirmatively sought input from Google, as required by Sections V and VI.B of the Final Judgment. Plaintiffs and the TC also reviewed documents and information provided by Google, as well as engaged with third parties. Plaintiffs and the TC further brought to bear the cumulative experience of Plaintiffs in the underlying litigation and of TC Members and TC Staff as professionals working extensively in the industry and in academia for over 20 years.

A. Input From Google

Pursuant to Section VII.A.7.c of the Final Judgment, the TC sent two demand letters to Google on issues related to search syndication and Search Text Ads syndication. The TC sent the first letter on April 27, 2026, seeking Google's current syndication agreements and documentation of its current syndication services and partners ("Demand Letter #1"). The TC also invited any other input or information that Google wished to provide regarding syndication license terms. In response, Google made a partial production to the TC on May 1, 2026, followed by another partial production on May 8, 2026.

On July 31, 2026, the TC sent Google a second demand letter, seeking documents that remained missing from Google's May productions as well as updated syndication services and agreements ("Demand Letter #2"). As before, the TC invited any other input or information that Google wished to provide regarding syndication license terms, service offerings, or the matters addressed in the letter. Google responded to the TC's July 31 letter on August 14, 2026, as well as submitted Google's own versions of draft template syndication licenses on August 10 and August 19, 2026.

As discussed in Part II *supra*, on August 31, 2026, Plaintiffs and the TC provided a recommendation statement, basis statement, and template license to Google. On September 8, 2026, Google provided a written set of requests for additional information, and Plaintiffs provided responses and additional information to Google on September 15, 2026. In addition, as discussed above, Google requested three calls between Google employees and the TC on three different categories of topics related to the template license, which calls were held on September 25 and September 29, 2026. After receiving Google's objections on September 29, 2026, the Parties also held two meet and confers.

Plaintiffs and the TC developed the Recommended Template based on the syndication agreements Google produced, together with the TC's analysis of the most favorable terms across all available agreements. That analysis identified the best available commercial terms for each provision, from which Plaintiffs and the TC derived terms consistent with this Court's instruction that, with few exceptions, the Recommended Template include terms "no worse than" or "functionally equivalent to" those offered to any other user of Google's search syndication and Search Text Ads products. *See, e.g.*, Final J. §§ V.B.2–3, VI.B.1–2; Final J. Op. at 37–44. In addition, Plaintiffs and the TC relied on information from third parties, the TC's cumulative

expertise, and the requirements of the Final Judgment itself, including explicit terms setting forth what must be included in a remedial syndication license template. *See, e.g.*, Final J. §§ V.A (describing what must be syndicated under the remedial search syndication license); V.B.4 (explicit syndication cap and tapering); VI.B.9 (scope of permitted subsyndication).

As discussed *supra*, Plaintiffs and the TC also reviewed and considered Google's objections to the template license submitted to Google on August 31. The Recommended Template reflects Plaintiffs' and the TC's efforts to address those objections, to the extent they believed it was appropriate to do so.

B. Material Information Relied Upon

Pursuant to Paragraphs 1 and 2 of the May 20 JSR Appendix, Plaintiffs and the TC hereby identify the material information relied upon to support the Recommendation Statement, more specifically the terms of the Recommended Template, as follows:

- Final Judgment (ECF No. 1462)
- Final Judgement Opinion (ECF No. 1461)
- Remedies Opinion (ECF No. 1435)
- Protective Order (ECF No. 98)
- GOOG-DOJ-FJ-00000052
- GOOG-DOJ-FJ-00000108
- GOOG-DOJ-FJ-00000142
- GOOG-DOJ-FJ-00000293
- GOOG-DOJ-FJ-00000311
- GOOG-DOJ-FJ-00000348
- Letter from C. Connor (Google) to Technical Committee (Aug. 19, 2026) and accompanying Exhibits 4–6

- Brief Of *Amicus Curiae* Brave Software, Inc. In Support Of Neither Party, filed in Case 1:20-cv-03010-APM (D.D.C.) (ECF No. 1333)
- TC Interview with [redacted]
- TC Interview with [redacted]
- [redacted]
- [redacted]
- Letter from Dr. W. Oels (Ecosia) to Hon. A. Mehta (June 22, 2026) (produced as USDOJ-GOOG-FJ-000020)
- AdBeacon, *Performance Max Just Got Its First Network Controls in Almost Five Years*, https://www.adbeacon.com/performance-max-search-partners-display-network-exclude/ (July 28, 2026)
- Google Ads & Commerce Blog, *We're upgrading Dynamic Search Ads to AI Max*, https://blog.google/products/ads-commerce/dsa-upgrade-to-ai-max-2026/ (Apr. 15, 2026)
- Google AdSense Help, *Ads personalization settings in Google's publisher ad tags*, https://support.google.com/adsense/answer/7670312 (last visited Aug. 29, 2026)
- PPC Land, *Google quietly kills parked domain ads from Search Partner Network*, https://ppc.land/google-quietly-kills-parked-domain-ads-from-search-partner-network/ (last visited Aug. 28, 2026)
- PPC Land, *Google lets some PMax advertisers switch off search partners and display*, https://ppc.land/google-lets-some-pmax-advertisers-switch-off-search-partners-and-display/ (last visited Aug. 28, 2026)
- Search Engine Land, *Google sets AI Max migration timeline for Search campaigns*, https://searchengineland.com/google-sets-ai-max-migration-timeline-for-search-campaigns-485006 (Aug. 14, 20206)
- Search Engine Land, *Google tests Performance Max network controls with new Partners (Alpha) setting*, https://searchengineland.com/google-tests-performance-max-network-controls-with-new-partners-alpha-setting-482469 (July 15, 2026)
- Search Engine Land, *Why you should opt out of Google Search Partners*, https://searchengineland.com/google-search-partners-why-opt-out-481830 (July 8, 2026)
- Search Engine Land, *Google unveils major Search Partner Network update as it removes opt-out option*, https://searchengineland.com/google-search-partner-network-update-control-437948 (Feb. 27, 2024)

Pursuant to Paragraph 2(a) of the May 20 JSR Appendix and as indicated above, copies of the documents provided by [redacted], and Ecosia were produced to Google on August 31, 2026, at the same time that Plaintiffs and the TC provided a recommendation statement, basis statement, and template license to Google.

Also pursuant to Paragraph 2(a) of the May 20 JSR Appendix, the following chart provides a description of the substance of the material third-party information relied upon from the TC interviews referenced above:

Source	Description of the Substance of the Material Information Relied Upon
TC Interview with [redacted]	* HIGHLY CONFIDENTIAL PURSUANT TO MAY 20 JSR APPENDIX ¶ 4 AND THE PROTECTIVE ORDER * ▪ [redacted] ▪ [redacted] ▪ [redacted] ▪ [redacted] ▪ [redacted] ▪ [redacted]

Source	Description of the Substance of the Material Information Relied Upon
TC Interview with [redacted]	* HIGHLY CONFIDENTIAL PURSUANT TO MAY 20 JSR APPENDIX ¶ 4 AND THE PROTECTIVE ORDER * ▪ [redacted] ▪ [redacted] ▪ [redacted]

Although not required, Plaintiffs and the TC also provided Google with the chart below, which reflects the principal material information that was relied upon for certain sections of and exhibits to the Recommended Template. This chart was provided solely as a courtesy to facilitate Google's review of the Recommended Template. As Plaintiffs advised, this chart was not intended to be exhaustive and did not serve to limit or constrain the material information relied upon for any given section of or exhibit to the Recommended Template.

Recommended Template	Principal Material Information Relied Upon
Section 1 – Definitions	Final J. §§ V.A, V.B, VI.B, VII.A.1–3, VII.A.7, VII.C.3, IX Protective Order (ECF No. 98) Rem. Op. at 164, 212 GOOG-DOJ-FJ-00000142 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348

Recommended Template	Principal Material Information Relied Upon
	Ltr. from C. Connor to Technical Committee (Aug. 19, 2026) and accompanying Exs. 4–6 TC Inter. with [redacted]
Section 4 – Search Services Launch, Implementation, and Maintenance	Final J. §§ V.B, VII.A.7, VII.C.3 Final J. Op. at 36–37, 42–43 Rem. Op. at 99–104, 164, 178, 212 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348 USDOJ-GOOG-FJ-000008 TC Inter. with [redacted]
Section 5 – Search Text Advertising Services Launch, Implementation, and Maintenance	Final J. § VI.B Final J. Op. at 42 Rem. Op. at 164, 212 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348 TC Inter. with [redacted] Articles/web posts from AdBeacon, Google Ads & Commerce Blog, PPC Land, and Search Engine Land
Section 6 – Additional Provisions	Final J. §§ V.B, VI.A, VI.B, VII.A.7, VII.C.3, IX Final J. Op. at 9–10, 36–37, 46–47 Rem. Op. at 164, 212 GOOG-DOJ-FJ-00000142 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348 USDOJ-GOOG-FJ-000008
Exhibit A	Final J. §§ V.A, V.B, VI.B, VII.A.7, VII.C.3, IX Rem. Op. at 164, 212 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348

Recommended Template	Principal Material Information Relied Upon
	TC Inter. with [redacted]
Exhibit B	Final J. §§ V.A, VI.B, VII.A.7, VII.C.2–3 Rem. Op. at 164, 212 GOOG-DOJ-FJ-00000052 GOOG-DOJ-FJ-00000142 GOOG-DOJ-FJ-00000293 GOOG-DOJ-FJ-00000311 GOOG-DOJ-FJ-00000348 Ltr. from C. Connor to Technical Committee (Aug. 19, 2026) and accompanying Exs. 4-6 Brief Of *Amicus Curiae* Brave USDOJ-GOOG-FJ-000008 USDOJ-GOOG-FJ-000020 TC Inter. with [redacted] Article/web post from Google AdSense Help
Exhibit C	Final J. §§ V.B, VI.B, VII.A.7, VII.C Final J. Op. at 42–43 Rem. Op. at 99–104, 164, 212 GOOG-DOJ-FJ-00000108 GOOG-DOJ-FJ-00000142 GOOG-DOJ-FJ-00000348 Ltr. from C. Connor to Technical Committee (Aug. 19, 2026) and accompanying Exs. 4–6 USDOJ-GOOG-FJ-000001 USDOJ-GOOG-FJ-000008 USDOJ-GOOG-FJ-000020 TC Inter. with [redacted] TC Inter. with [redacted]

Dated: October 9, 2026

Respectfully submitted,

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