

**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

JOINT STATUS REPORT

In accordance with the Court's Minute Order of March 8, 2021, the parties in *United States v. Google LLC* and *State of Colorado v. Google LLC* submit the following Joint Status Report to update the Court on their progress concerning search protocols and search terms.

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

As the parties noted in their Joint Status Report of March 5, 2021 (ECF No. 116), Plaintiffs submitted to Google on March 1 a proposed search protocol that included additional search terms and custodians, and Google provided a counterproposal on March 4. The parties have worked each day since then on attempting to narrow the points of dispute. Specifically,

Google provided hit reports and other data relating to Plaintiffs' proposal on March 6, 7, and 8; Plaintiffs submitted a modified proposal on March 8; and Google provided hit reports relating to that modified proposal on March 9. Plaintiffs also submitted descriptions of the relevant roles and responsibilities for disputed custodians on March 9.

The parties intend to continue the meet-and-confer process over the next few days and have committed to exchange additional information in the interest of resolving or narrowing the points of dispute. The parties propose to file an update, including as necessary position statements regarding any unresolved issues, on Thursday, March 18.

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

As the parties noted in their Joint Status Report of March 5, 2021 (ECF No. 116), the Plaintiff States have an interest in the search terms and custodians selected through the process described above and therefore are participating in the meet-and-confer process, including the exchange of information and development of modified proposals.

Dated: March 10, 2021

Respectfully submitted,

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