

**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

FILED UNDER SEAL

**PLAINTIFF STATES' MOTION FOR SANCTIONS AGAINST GOOGLE, LLC AND
AN EVIDENTIARY HEARING TO DETERMINE APPROPRIATE RELIEF**

For the reasons described in Plaintiff States' Memorandum In Support, Plaintiff States respectfully move the Court to: (1) hold that Google has engaged in spoliation in violation of Rule 37(e); (2) order an evidentiary hearing to assess the appropriate sanctions to remedy Google's spoliation; and (3) order Google to provide further information about custodians' history-off chat practices, through written declarations and oral testimony, in advance of the requested hearing.

Dated: February 12, 2023

Respectfully submitted,

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