



**U.S. Department of Justice**

Antitrust Division

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*Liberty Square Building  
450 5<sup>th</sup> Street, N.W.  
Washington, DC 20530*

March 5, 2026

**VIA ECF**

Honorable Leda Dunn Wettre, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *United States of America, et al. v. Apple Inc.*  
No. 2:24-cv-04055 (JXN-LDW)  
Joint Proposal for Briefing Agency Discovery Disputes**

Dear Judge Wettre:

Pursuant to the Court's Text Order entered on February 27, 2026, Dkt. 380, Plaintiff United States of America and Defendant Apple Inc. ("Apple") respectfully propose April 16, 2026 as a mutually agreeable date for the submission of a joint dispute letter on the issue of federal agency discovery involving 14 federal agencies.<sup>1</sup> The parties request that each side be allowed up to 9 pages total for the joint dispute letter.

The United States will not know until it reviews Apple's submission and confers with the affected agencies whether it will be required to address issues that implicate classified, national-security-related, or otherwise protected information with respect to any federal agency. If it is necessary to seek leave to invoke procedures for the protection against unauthorized disclosure of any classified, national-security-related, or otherwise protected information in the custody of the United States District Courts, *see, e.g.*, 18 App. 3 U.S.C. § 9, the schedule may require modification. Apple's position is that it is not seeking the production of classified materials and thus the above-referenced procedures will be unnecessary.

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<sup>1</sup> The 14 agencies are: Central Intelligence Agency, Department of Commerce, Department of Homeland Security, Department of Labor, Department of State, Department of War, Federal Bureau of Investigation, Federal Trade Commission, General Services Administration, National Aeronautics and Space Administration, National Security Agency, Office of the Director of National Intelligence, Office of Management and Budget, and the Office of Personnel Management.

If the above briefing schedule and structure meets Your Honor's approval, the parties respectfully request that Your Honor "so order" this letter and enter it on the docket.

Respectfully submitted,

/s/ Aaron M. Sheanin

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SO ORDERED: 3/9/2026



Hon. Leda D. Wettre, U.S.M.J.