

Appendix C

Appendix C
Examples of Google Employees Spoliating Chats

Ex. #	Document Bates	Custodian/ WITNESS Requesting or Permitting History Off	Date of Chat	Chat Excerpt	Custodians/ WITNESSES Involved (custodian date; hold date)
4X	GOOG-AT-MDL-007610074	Amin Charaniya	9/23/2022	acharaniya@google.com 2022-09-23T01:23:58.401Z btw didnt realize history is on for us acharaniya@google.com 2022-09-23T01:24:02.913Z mind if i turn it off? hsnair@google.com 2022-09-23T01:24:10.549Z sure [end of chat]	Amin Charaniya custodian: 1/15/2021 hold: 2/3/2021
4W	GOOG-AT-MDL-007857170	Anthony Chavez	6/10/2022	aschavez@google.com 2022-06-10T03:33:38.162Z separate topic - this chat room has history / is persisted? . . . can we configure it to be transient? . . . vinaygoel@google.com 2022-06-10T03:39:19.589Z if its not doable, are folks okay with a group chat? the benefit? no history. The con? No threads. . . . Kevin and I just tried testing it out. We can't within a Space aschavez@google.com 2022-06-10T03:40:40.053Z that's a bummer . . . my sense is we deal with a group chat? though I am in some spaces that have no history (though maybe not multi threading) . . . vinaygoel@google.com 2022-06-10T03:44:18.223Z okay, let me create a new one right now. It'll still be a space. aschavez@google.com 2022-06-10T03:44:24.242Z cool - ty [end of chat]	Anthony Chavez custodian: 2/20/2020 hold: 1/22/2021 Marshall Vale custodian (TX): 1/14/2021 hold: 1/21/2021

4R	GOOG-AT-MDL-008836562	WOOJIN KIM	11/4/2021	woojink@google.com 2021-11-04T16:39:15.556Z can you turn off history? woojink@google.com 2021-11-04T16:39:40.559Z and could you add katie kurtz pls gomes@google.com 2021-11-04T16:50:51.761Z Added Katie - if you have threading, then history is on, so this is basically like email. [end of chat]	WOOJIN KIM custodian: 8/3/2020 hold: 1/22/2021 Benedict Gomes custodian (CID only): 11/20/2019 hold: unknown
4L	GOOG-AT-MDL-010087323	Amin Charaniya	1/27/2021	dardelean@google.com 2021-01-28T17:00:49.832Z cool. btw - this group is on record . . . we should kill it and create one that is single threaded and off the record srireddy@google.com 2021-01-28T17:01:40.628Z not sure why - yes good pt! ... dardelean@google.com 2021-01-28T17:47:25.960Z who is in charge with creating this room? I really feel super uncomfortable us continuing this on the record ... touma@google.com 2021-01-28T17:56:53.355Z im gonna create a new room and kill this one ... dardelean@google.com 2021-01-28T17:57:19.593Z sorry I copied everyone into a new room . . . let's stop using this one [end of chat]	Amin Charaniya custodian: 1/15/2021 hold: 2/3/2021 Christophe Combette custodian: 5/26/2023 hold: 6/12/2023 (took over for another custodian 2020)
4S	GOOG-AT-MDL-010366478	Danielle Romain	11/10/2021	yvettehc@google.com 2021-11-10T18:15:58.284Z ok for me to keep history on here? need to keep some info for memory purposes dromain@google.com 2021-11-10T18:34:34.134Z Yvette, unfortunately, I'm not supportive of turning history on. The discussion that started this thread gets into legal and potentially competitive territory, which I'd like to be conscientious of having under privilege. So that you're aware, when history is on, it's discoverable. Sometimes that's totally fine but I'd like to stick to the default of history off. Thanks [end of chat]	Danielle Romain custodian: 2/20/2020 hold: 1/22/2021

4E	GOOG-AT-MDL-010699441	BONITA STEWART	4/8/2020	Bonita Stewart , 2020-04-08 13:06:12 btw you might want to turn your chat history off Jason Washing , 2020-04-08 13:06:21 geez . . . for sure! . . . thank you! [end of chat]	BONITA STEWART custodian: 11/20/2019 hold: 10/4/2019 Jason Washing custodian: 7/9/2021 hold: 1/22/2021
4P	GOOG-AT-MDL-010777654	APARNA PAPPU	6/10/2021	mchasan@google.com 2021-06-11T00:41:39.289Z Please keep history off on this legally sensitive chat room apappu@google.com 2021-06-11T00:45:30.150Z @Mike Chasan who all have we debriefed in legal? [end of chat, other than updates to "room membership"]	APARNA PAPPU custodian: 8/3/2020 hold: 1/22/2021 JIM GILES custodian: 8/3/2020 hold: 1/22/2021
4U	GOOG-AT-MDL-011236786	MARTIN PAL	12/15/2021	mpal@google.com December 15, 2021 at 8:36:59 PM UTC Hope it's OK to have chat history on ... tris@google.com December 15, 2021 at 9:13:26 PM UTC We want chat history on? I would generally prefer for us to keep history off. Is there a strong reason to keep this on? ... cilvento@google.com December 15, 2021 at 9:32:31 PM UTC I think history is on at this point . . . But we'll turn it off now as discussed mpal@google.com December 15, 2021 at 9:32:40 PM UTC let's turn it off then [end of chat]	MARTIN PAL custodian: 5/18/2023 hold: 1/22/2021
4O	GOOG-AT-MDL-011693260	Roshan Khan	3/5/2021	Roshan Khan , 2021-03-05 07:21:19 Let's figure our position then we can figure out who does the work. Unclear to me best place Roshan Khan , 2021-03-05 07:22:43 Can you turn history off . . . Otherwise let's chat in Vcs [end of chat]	Roshan Khan custodian: 1/15/2021 hold: 1/22/2021

4V	GOOG-AT-MDL-012246761	Vip Andleigh	2/1/2022	vip@google.com 2022-02-02T21:33:44.206Z holy moly. FB down 23% in afterhours . . . I'd also assume engagement is weakening on the core app and hurting their cross-platform measurement products, etc. . . . dyc@google.com 2022-02-02T21:37:04.738Z Took a quick glance at the press release. . . . They say it's on both pricing and impression deceleration. They are blaming a shift to Reels (lower CPM than stories and news feed) and ATT. brownadam@google.com 2022-02-02T21:51:01.685Z The other factor I'd throw out there is increased competition. . . . craigma@google.com 2022-02-02T23:04:14.429Z Also, suggest we turn off history since there is no business need for it unless anyone feel strongly against [end of chat]	Vip Andleigh custodian: 8/3/2020 hold: 1/22/2021
4J	GOOG-AT-MDL-014680318	Vidhya Srinivasan	10/29/2020	Christophe Combette , 2020-10-29 10:08:09 do you know if our pings are privileged / discoverable? Vidhya Srinivasan , 2020-10-29 10:08:39 we should turn history off [end of chat]	Vidhya Srinivasan custodian: 2/20/2020 hold: 1/22/2021 Christophe Combette custodian: 5/26/2023 hold: 6/12/2023
4C	GOOG-AT-MDL-018356212	Prabhakar Raghavan	3/3/2020	sundar@google.com 2020-03-03T16:16:47.476Z We can have everyone join at noon pragh@google.com 2020-03-03T16:18:35.601Z Let's decide at noon whether to recreate as a History off group chat pragh@google.com 2020-03-03T16:19:27.562Z The chat within video meetings loses history when the call ends I believe, but I'll confirm [end of chat]	Prabhakar Raghavan custodian: 11/20/2019 hold: 10/4/2019 Sundar Pichai custodian: 11/20/2019 hold: 10/4/2019
4D	GOOG-AT-MDL-018356213	Prabhakar Raghavan	3/3/2020	pragh@google.com 2020-03-03T16:32:40.586Z ok team false start - by the IRC semantics of chat Rooms, History remains ON - so I'm going to kill this room and re-create as a group chat with History OFF. sorry about that	Prabhakar Raghavan custodian: 11/20/2019 hold: 10/4/2019

4I	GOOG-AT-MDL-018491727	Vidhya Srinivasan	10/6/2020	vids@google.com 2020-10-06T17:48:31.936Z pls turn off history lawrencechang@google.com 2020-10-06T17:49:35.187Z oh i see. let's be careful there, karthik. acharaniya@google.com 2020-10-06T17:51:49.886Z touma has some extension that keeps turning history on touma@google.com 2020-10-06T17:52:36.119Z it's probably easier to remove me from the chat group while i find the extension [end of chat]	Vidhya Srinivasan custodian: 2/20/2020 hold: 1/22/2021 Amin Charaniya custodian: 1/15/2021 hold: 2/3/2021
4N	GOOG-AT-MDL-019389207	Vip Andleigh	2/10/2021	dallsopp@google.com 2021-02-10T21:57:32.850Z Can we also keep the info confidential to this group? . . . vip@google.com 2021-02-10T21:59:28.472Z lets keep confi, we can also turn off history. if i see something important, i'll note it down somewhere . . . dallsopp@google.com 2021-02-10T22:00:07.333Z I also dont know how to turn history on... . . . https://docs.google.com/presentation/d/1kG1CYAotgeV-NGwB3ZWIFT-Z8eobOnNBqEAGzAfeHBM/edit#slide=id.gbb0c393bc6_0_0 . . . Proposal for rebooting Planning, starting by bold objectives outline by team. Next step is fleshing out headwinds, using Finance "risk Log" as a starting point. I'll share w/ this group once I have it. crhyu@google.com 2021-02-11T15:58:36.668Z Thanks Dale this is really helpful to see. . . . dallsopp@google.com 2021-02-11T16:12:15.008Z not final. will respond shortly. closing meeting [end of chat]	Vip Andleigh custodian: 8/3/2020 hold: 1/22/2021
4A	GOOG-AT-MDL-B-003992377	NITISH KORULA (requested by in-house counsel, Uchechi Okereke)	11/12/2019	Nitish Korula , 2019-11-12 12:59:25 Curt, Jonathan: Can we preserve old DT files from the last 60 days Curt Harting , 2019-11-12 12:59:35 Talked to Chech now . . . Uchechi Okereke , 2019-11-12 12:59:49 Please can we turn history off? [end of chat]	NITISH KORULA custodian: 2/16/2021 hold: 10/4/2019

4G	GOOG-AT-MDL-B-004008622	CHRIS LASALA	8/18/2020	Chris LaSala, 2020-08-18 13:01:59 do you know how much buy-side changes are because of &#39;efficiency&#39; . . . vs decreased win rate . . . because if a big part is decreased win rate, we&#39;d expect buyside to adjust . . . so the loss will come back Nash Islam , 2020-08-18 13:02:53 dont know but will look into. good q . . . Chris LaSala , 2020-08-18 13:03:18 also, maybe start an off the record ping thread with Duke,you, me . . . about this . . . and lets the 3 of us get on the same page . . . about what, if anything, we (sell-side) should do about it Nash Islam , 2020-08-18 13:03:57 k kicking off now [end of chat]	CHRIS LASALA custodian: 2/20/2020 hold: 1/22/2021 DUKE DUKELLIS custodian: 2/20/2020 hold: 1/22/2021
4Q	GOOG-AT-MDL-B-004073824	Sundar Pichai (CEO)	10/12/2021	sundar@google.com October 12, 2021 at 4:53:16 AM UTC Need the link for my leaders circle tomorrow sundar@google.com October 12, 2021 at 4:53:28 AM UTC also can we change the setting of this group to history off [discussion of linked draft document]	Sundar Pichai custodian: 11/20/2019 hold: 10/4/2019
4B	GOOG-AT-MDL-B-004309756	BONITA STEWART	12/3/2019	Bonita Stewart , 2019-12-03 11:40:29 fyi. on your chats you have the history turned on. we are advised to turn history off so messages are cleared after 24 hours Cyrus Beagley , 2019-12-03 11:41:50 oh i didn&#39;t know that -- i&#39;ve turned it on so i don&#39;t loose messages! I&#39;ll turn it off then... [end of chat]	BONITA STEWART custodian: 11/20/2019 hold: 10/4/2019

4T	GOOG-AT-MDL-B-004468047	Adam Juda	11/17/2021	wendyklogan@google.com November 17, 2021 at 1:16:39 AM UTC Adding Aysun, who is excited to drive and coordinate this effort from a Business Strategy perspective. Welcome ... juda@google.com November 17, 2021 at 2:43:40 PM UTC What is the history status of this group? wendyklogan@google.com November 17, 2021 at 8:33:57 PM UTC Given it's a thread chat room, we cannot turn history off and chat retention is 18 months. https://support.google.com/info-gov/answer/9366391 wendyklogan@google.com November 17, 2021 at 8:34:34 PM UTC We can pivot to group chat with history off -- or --- keep the current setup and only reserve this space for non-sensitive discussions ... juda@google.com November 17, 2021 at 8:38:27 PM UTC My preference is history off wendyklogan@google.com November 17, 2021 at 9:07:09 PM UTC sounds good. Will pivot to Google Chat vs. Google Spaces [end of chat]	Adam Juda custodian: 2/20/2020 hold: 1/22/2021
4H	GOOG-DOJ-AT-01828942	CHRIS LASALA	9/16/2020	Nash Islam , 2020-09-16 07:54:22 Should i send an email to Duke & Naomi right now on this? . . . "Per discussion with Spero & his feedback from PS, we should avoid direct mentions of sign-in and email consent in our MSA to align with the negotiating strategy where we will not be specific about our alternative approach for measurement and attribution" Nash Islam , 2020-09-16 07:56:23 or too sensitive for email so keep on ping? Chris LaSala , 2020-09-16 07:58:32 start a ping with history turned off . . . duke, naomi, alex, me Nash Islam , 2020-09-16 07:59:33 k [end of chat]	CHRIS LASALA custodian: 2/20/2020 hold: 1/22/2021 DUKE DUKELLIS custodian: 2/20/2020 hold: 1/22/2021

4F	GOOG-AT-MDL-008384936	Adam Juda	8/8/2020	nazli@google.com 2022-08-08T15:55:38.064Z Adding all the invitees from the war room ... juda@google.com 2022-08-08T17:22:45.678Z so it's no longer a Tech-only meeting? . . . Also, I see that History is on in this chat. If that can't be changed, can I please be removed from this discussion? tinaweyand@google.com 2022-08-08T17:25:36.294Z today includes GPL - we need advertiser feedback. nazli@google.com 2022-08-08T17:25:40.284Z agreed lets remove [end of chat]	Adam Juda custodian: 2/20/2020 hold: 1/22/2021 Marcel Crasmaru custodian: 1/15/2021 hold: 2/3/2021
4M	GOOG-AT-MDL-018491736	Prabhakar Raghavan (in-house counsel Ted Lazarus was also on the chat)	1/27/2021	pragh@google.com 2021-01-27T17:38:56.017Z related to this apple privacy discussion, from today's NYT: "The result is that the data practices of Apple's apps are less upfront. If Apple wants to lead the privacy conversation, it can set a better example by making language clearer — and its labeling program less self-serving. When I asked why all apps shouldn't be held to the same standards, Apple did not address the issue further." cathyedwards@google.com 2021-01-27T17:40:11.298Z I worry that this will be like Apple and China - they are just better at handling this press (and their employees) than we are so won't be so drawn into an ongoing story pragh@google.com 2021-01-27T17:40:38.624Z well then we just need to get a lot better pragh@google.com 2021-01-27T17:47:11.796Z ugh pl stop this chat, for some reason History is on [end of chat]	Prabhakar Raghavan custodian: 11/20/2019 hold: 10/4/2019 JERRY DISCHLER custodian: 11/19/2019 hold: 1/22/2021 Adam Juda custodian: 2/20/2020 hold: 1/22/2021 Rany Ng custodian: 8/3/2020 hold: 1/22/2021 Vidhya Srinivasan custodian: 2/20/2020 hold: 1/22/2021

4K	GOOG-AT-MDL-B-004468045	Adam Juda	11/11/2020	John Winfield , 2020-11-11 17:05:43 that's the launch as viewed from aq-launches . . . but, this begs the question: who is on shopping-ads-commerce-headsup . . .if Adam doesn't have access Adam Juda , 2020-11-11 17:07:01 How do we turn History off? I don't do History on [end of chat]	Adam Juda custodian: 2/20/2020 hold: 1/22/2021
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