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4 UNITED STATES DISTRICT COURT
5 NORTHERN DISTRICT OF CALIFORNIA
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7 ANIBAL RODRIGUEZ, et al.,
8 Plaintiffs,
9 v.
10 GOOGLE LLC,
11 Defendant.

Case No. [20-cv-04688-RS](#) (AGT)

DISCOVERY ORDER

Re: Dkt. No. 261

12 1. *Segeritz and Vakharia searches.* Google must conduct targeted searches of Micha
13 Segeritz’s and Suneeti Vakharia’s custodial files using plaintiffs’ proposed search string ((WAA*
14 OR “(s)WAA*” OR sWAA*) AND (revenue* OR profit*)). Google must then provide plaintiffs
15 with hit counts for those searches and produce responsive documents.

16 These additional searches are warranted because Greg Fair, a former Google product man-
17 ager who had a key role in developing Google’s WAA feature, testified that Segeritz and Vakharia
18 studied WAA’s revenue impact for Google. *See* Dkt. 261 at 2. That revenue impact is relevant to
19 plaintiffs’ demand for unjust enrichment because plaintiffs maintain that Google unlawfully mone-
20 tized mobile app data from users who had WAA turned off.

21 In opposing plaintiffs’ targeted searches, Google insists that Segeritz and Vakharia did *not*
22 conduct a WAA revenue study. In declarations accompanying the parties’ joint statement, Segeritz
23 and Vakharia say the same. *See* Dkts. 261-4, -5. Plaintiffs, however, want to confirm for themselves.
24 Their desire to do so is reasonable given Fair’s testimony that Segeritz and Vakharia *did* conduct a
25 WAA revenue study.

26 Google also notes that plaintiffs haven’t suggested that the revenue study, assuming it exists,
27 relates specifically to Firebase. A fair point. But unlike earlier requests made by plaintiffs (e.g., to
28 produce “*all* WAA-off financial analyses,” dkt. 247 at 4 (emphasis in original)), the current request

