

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the matter of:

Intuit Inc.,
a corporation,

Respondent.

Docket No. 9408

**COMPLAINT COUNSEL’S REPLY IN SUPPORT OF MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

Pursuant to the December 22, 2022 Order Directing Further Response, Complaint Counsel submits this Reply in support of its December 9, 2022 Motion to Compel (the “Motion”).

I. The Motion is Timely

Intuit focuses its Opposition not on the merits of Complaint Counsel’s (the “CC”) argument that Intuit withheld highly relevant documents that it never searched or produced, but instead asks this Court to deny CC’s motion as untimely. *See generally* Opp. at 1-7. Where CC pursued the documents, negotiated until the parties reached an impasse, and filed this motion in a timely manner, this Court can and should order Intuit to produce the responsive, probative data.

First, Intuit misreads the April 27, 2022 Scheduling Order (the “Order”), which places the burden equally on “the *parties*” to “meet and confer to attempt to resolve any disputes” within five days of discovery objections being served. *See* Order at par. 7 (emphasis added). Intuit provides no support for the notion that the parties meeting and conferring one day after the specified time-period is determinative of the timeliness of a motion later brought under Rule 3.38. Intuit’s own conduct, in fact, belies its position, as it continued to negotiate over the production of CRM data for almost two

months, breathing new life into the dispute¹ even if Intuit's strained reading of the Order were credited.

Intuit's next argument is no less contrived. While the Order provides that a motion to compel shall be filed within 30 days of the service of objections (here, by November 2), this deadline is superseded where the parties are "engaging in negotiations over a discovery dispute." Order at par. 8. By Intuit's own admission, the parties communicated about the CRM data on October 12, 26 and 28, November 23, and December 1, and Intuit produced an incomplete CRM schema, requested by CC in the context of negotiating the production of CRM data, on November 1. Opp. at 3 to 4. CC further submits that relevant emails were exchanged on October 14, November 22 and November 28, including November emails sent by Intuit seeking to schedule the deposition of CC's data analyst – a witness identified by CC to testify primarily regarding the CRM data. GX 476 at ¶¶ 17-20.

CC, in continuing to press Intuit to produce CRM data until it learned, categorically, that Intuit would not produce the data, sought to resolve this dispute with counsel without bringing the Court into the fray. As shown, the parties did not truly reach an impasse until December 5.² The Motion, filed four days later, is therefore timely and should be granted.

II. The CRM Data is Neither Cumulative nor Duplicative

While the bulk of Intuit's Opposition focuses on the issue of timeliness and not the underlying merits of the Motion, in the two paragraphs in which Intuit discusses the

¹ Had Intuit timely raised that the meet and confer occurred on day 6, CC could have sought relief from the Court to extend the specified time period. Intuit's belated objection, however, is waived.

² Assuming, arguendo, that the Court finds CC's Motion to be untimely, it may still grant the motion if it finds excusable neglect. *See In re Jerk, LLC*, 2015 FTC LEXIS 51, *4 (F.T.C. March 11, 2015). Here, CC in good faith believed that negotiations over the CRM were ongoing.

CRM data, it misstates the facts by claiming the requested data is cumulative or duplicative of the consumer review data that Intuit produced. This is not the case. The two data sets [REDACTED]

[REDACTED]

The thrust of the Motion is that Intuit, despite CC's efforts to secure the responsive documents through negotiations, is improperly withholding CRM data, including consumer complaints about TurboTax's free product. Intuit does not deny that the database exists or claim to have searched the database and concluded that the data is non-responsive. Instead, Intuit argues, in part, that "such complaint-specific data is likely to be of minimal benefit to CC because it would be cumulative and duplicative of the extensive customer-review data already produced in response to RFP No. 19." Opp. at 8; *see* Opp. at Ex. A, Dec. 19, 2022 Decl. of D. Woodman, ¶ 18. This statement by Intuit, which is not supported by any citation to the relevant documents, is false.

As set forth in the Motion and attachments thereto, Intuit [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Because of these fundamental differences between the data sets, the requested CRM data is neither cumulative nor duplicative of the consumer review data provided to CC. Respondent's *only* evidence of the supposed cumulative or duplicative nature of the data sets is a self-serving and vague statement of Respondent's counsel declaring that the data is "largely duplicative." Opp. at Ex. A, ¶ 18. This circular logic cannot overcome the evidence provided herein that the CRM data is neither duplicative nor cumulative of the consumer review data – the latter of which is, by its nature, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

This Court should also be dubious of Intuit's argument that the data is burdensome to search and produce. *See* Opp. at 7-8. Despite this claim, Intuit testified in a 3.33(c) deposition that [REDACTED]

[REDACTED] Mot. at 3. The testimony on this issue, then, demonstrates that [REDACTED]. *See generally* GX-145, GX 149. Likewise, even if a subset of responsive contacts in the CRM data were escalated to an attorney, it is highly dubious, without more, that Intuit is incapable of segregating those consumer contacts for a narrower privilege review.

III. CONCLUSION

For these reasons, and as set forth more fully in the Motion, the Motion to Compel Production of Documents should be granted.

Respectfully submitted,

Dated: December 28, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2022, I electronically filed the foregoing Reply in Support of Complaint Counsel's Motion to Compel Production of Documents using the FTC's E-Filing system, which will send notification of such filing to:

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Hon. D. Michael Chappell
Chief Administrative Law Judge
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Administrative Law Judge

I further certify that I also caused these documents to be served via email on:

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FEDERAL TRADE COMMISSION

IN THE MATTER OF:)
Intuit Inc.,) Docket No. 9408
a corporation,)
Respondent.)
_____)

Tuesday, November 15, 2022
Via Zoom Videoconference

The above-entitled matter came on for oral
examination, pursuant to notice, at 12:04 p.m.
Eastern Time, for the testimony of:

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Individual Capacity

██████████ - Individual

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A P P E A R A N C E S:

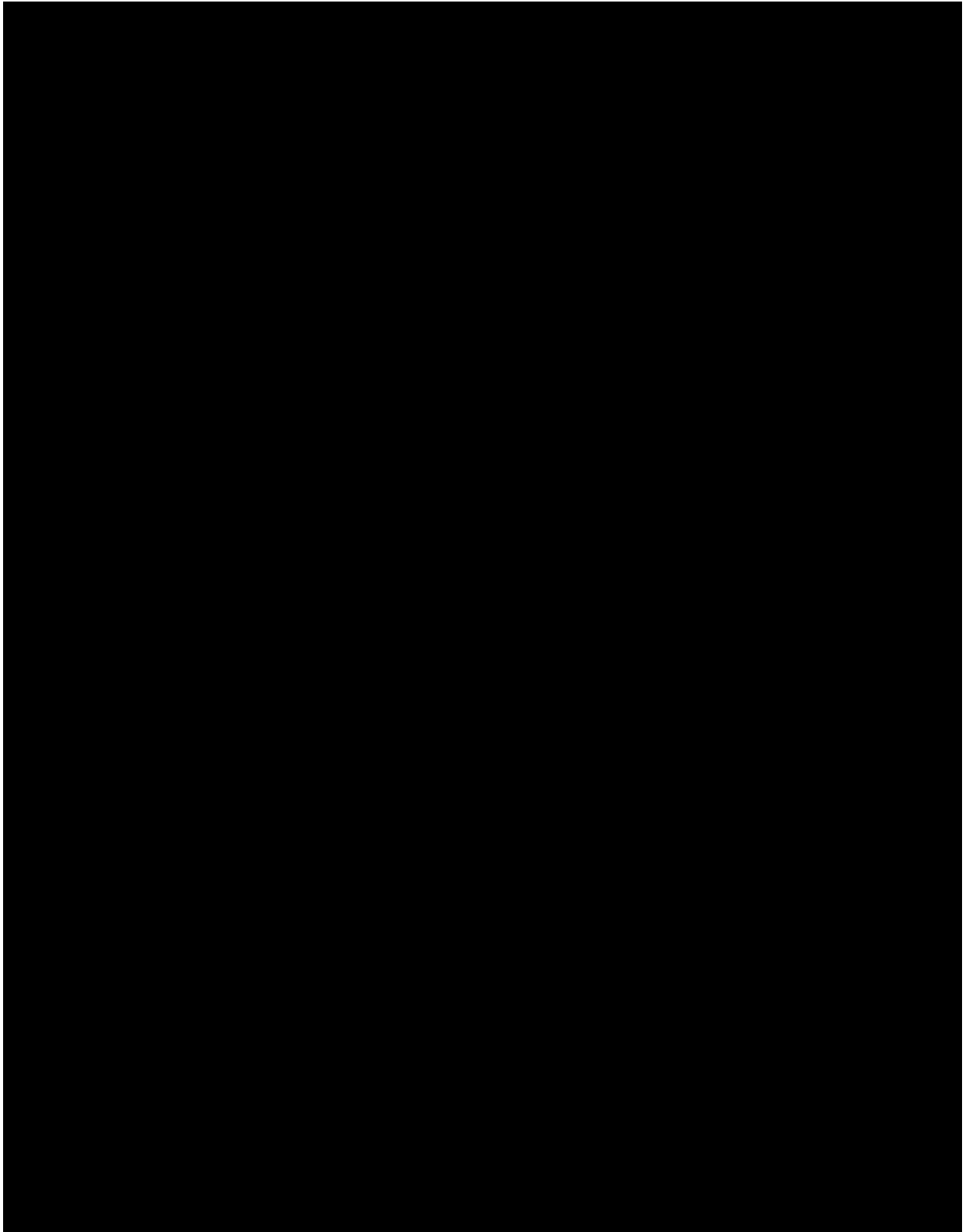
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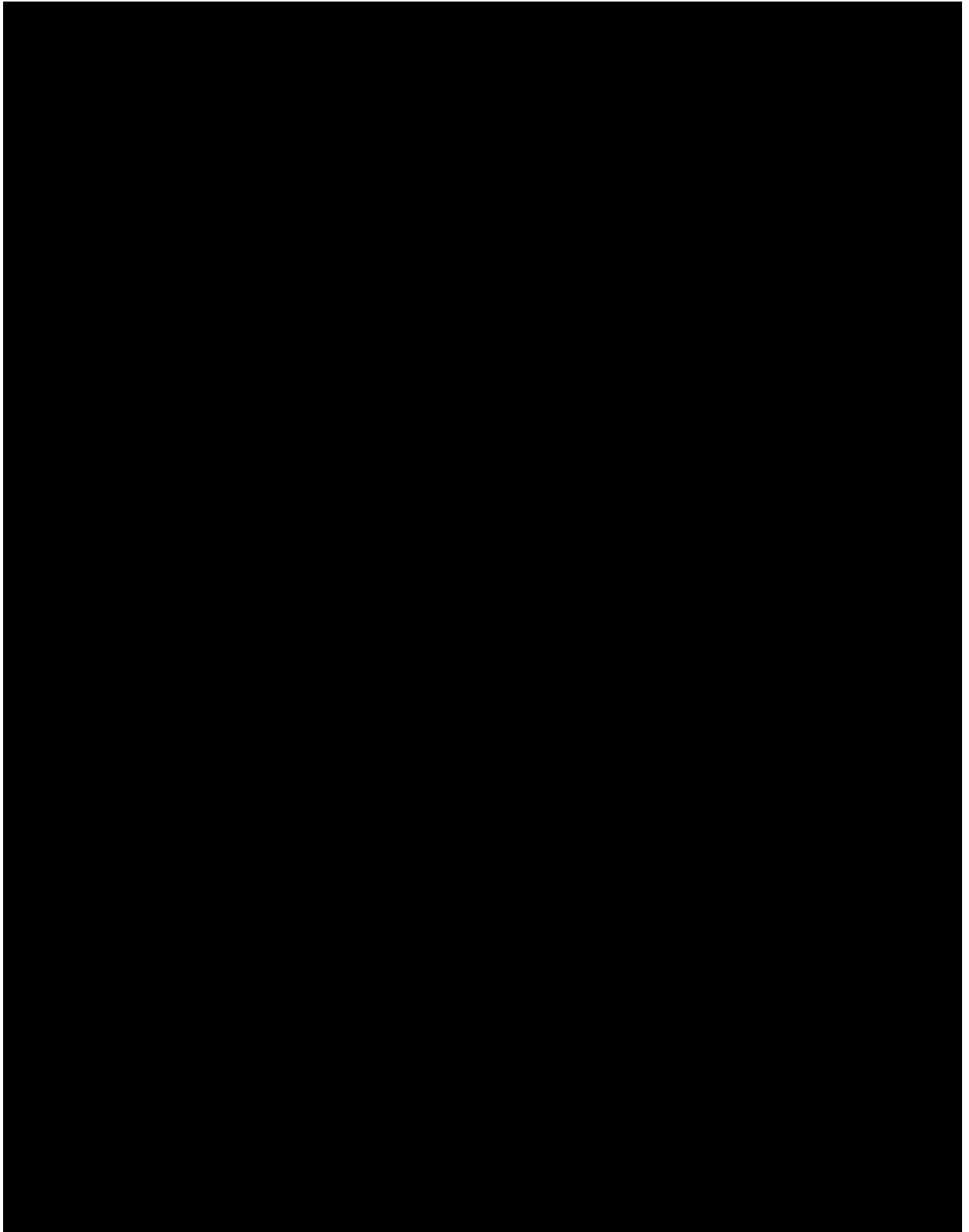
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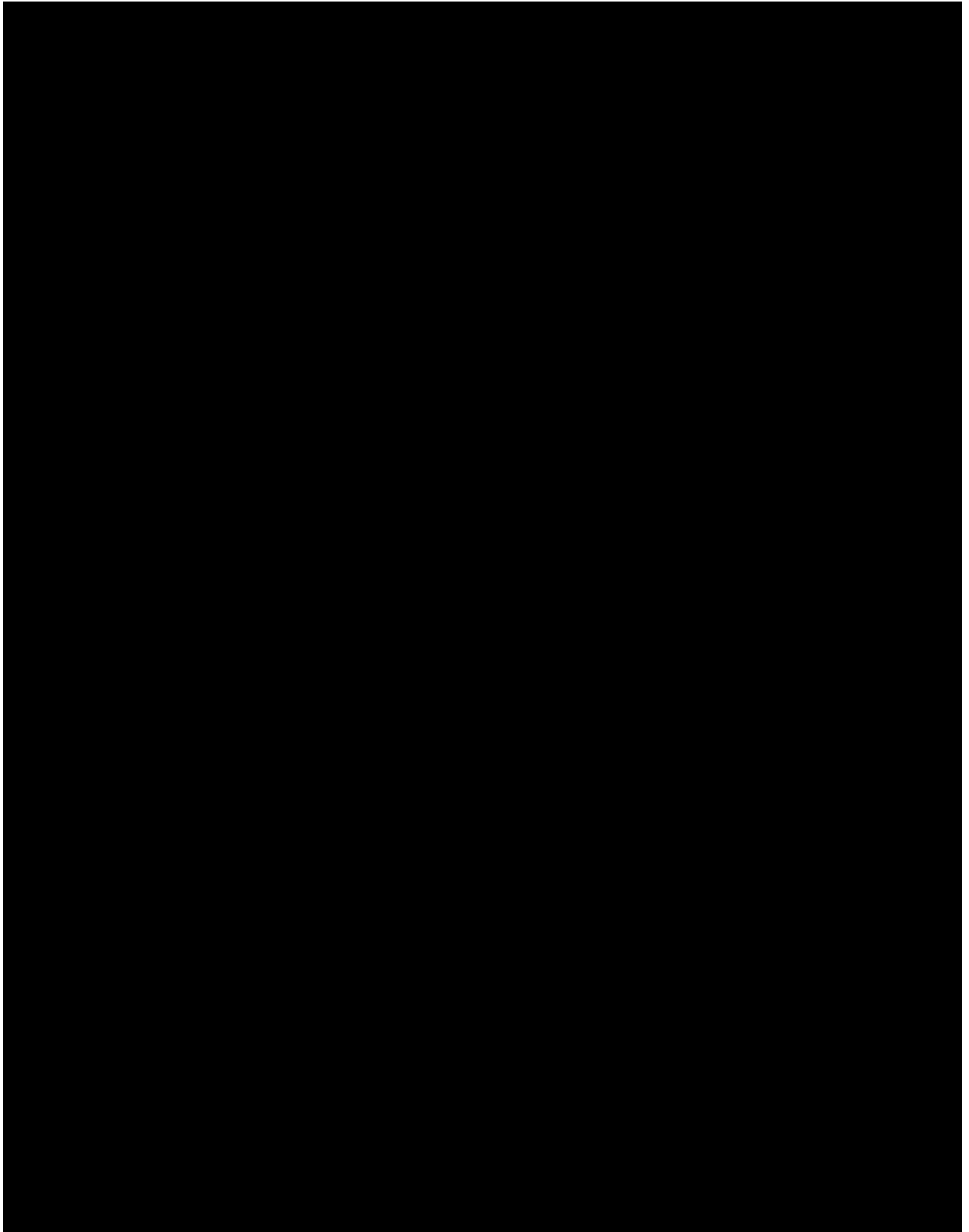
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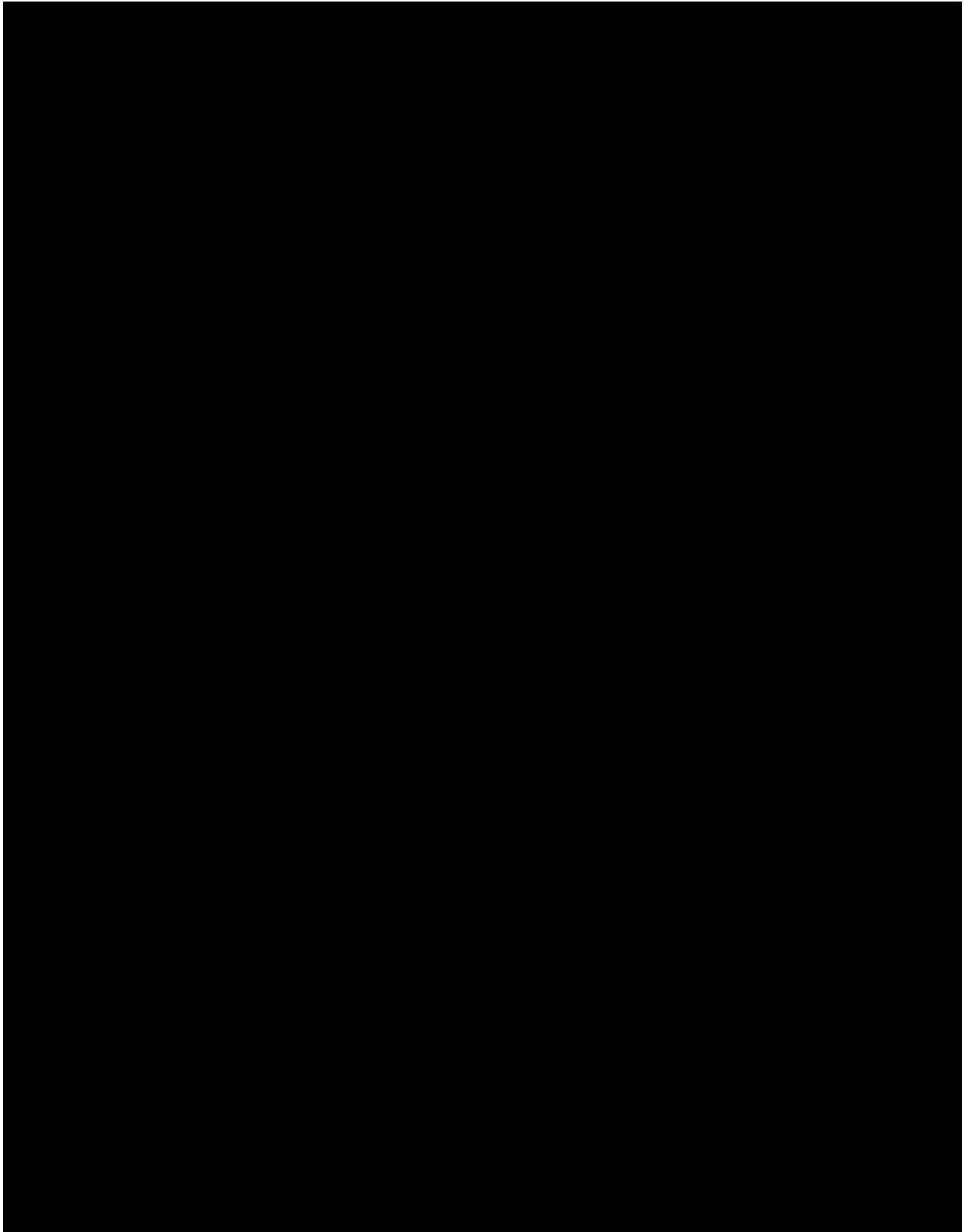
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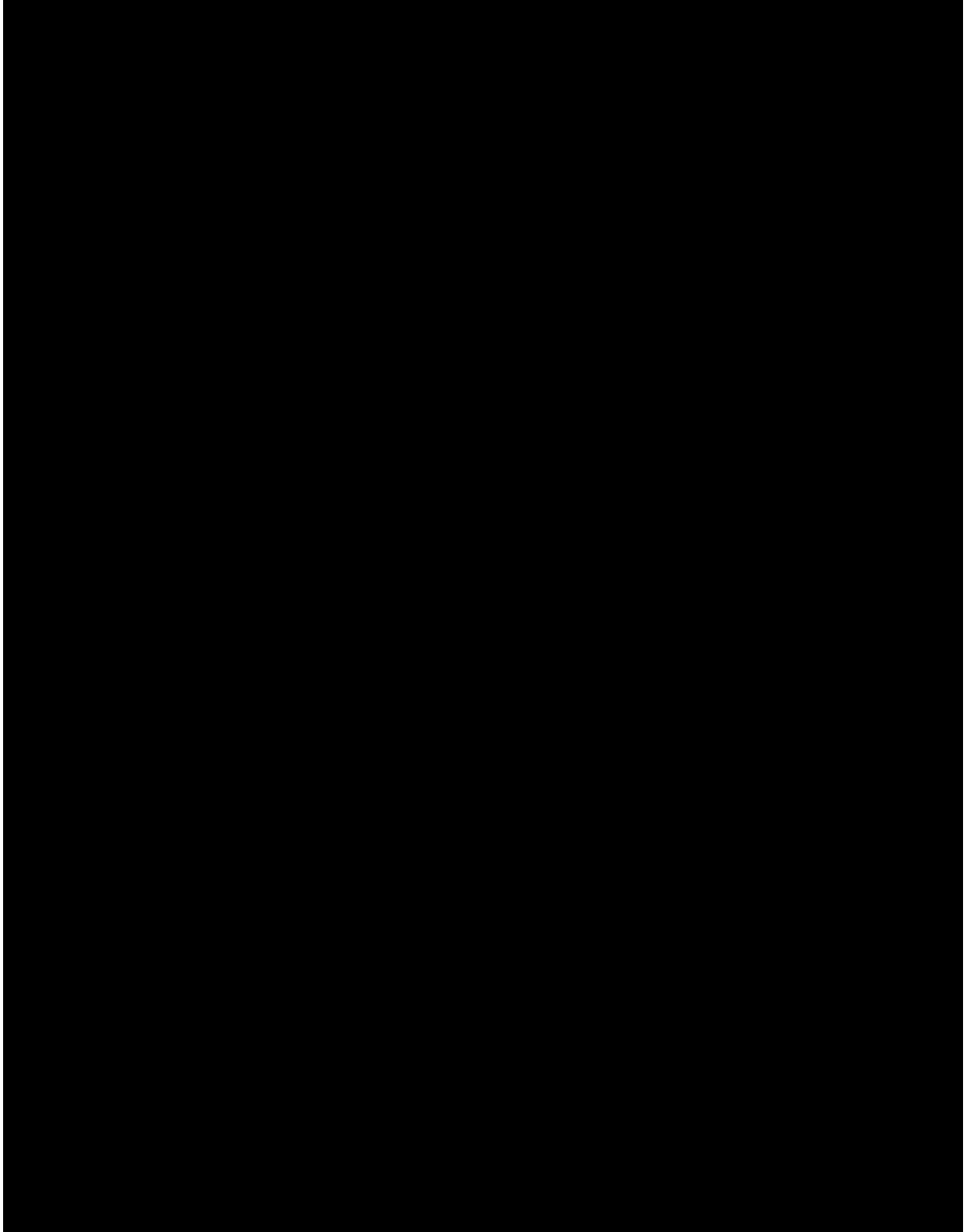
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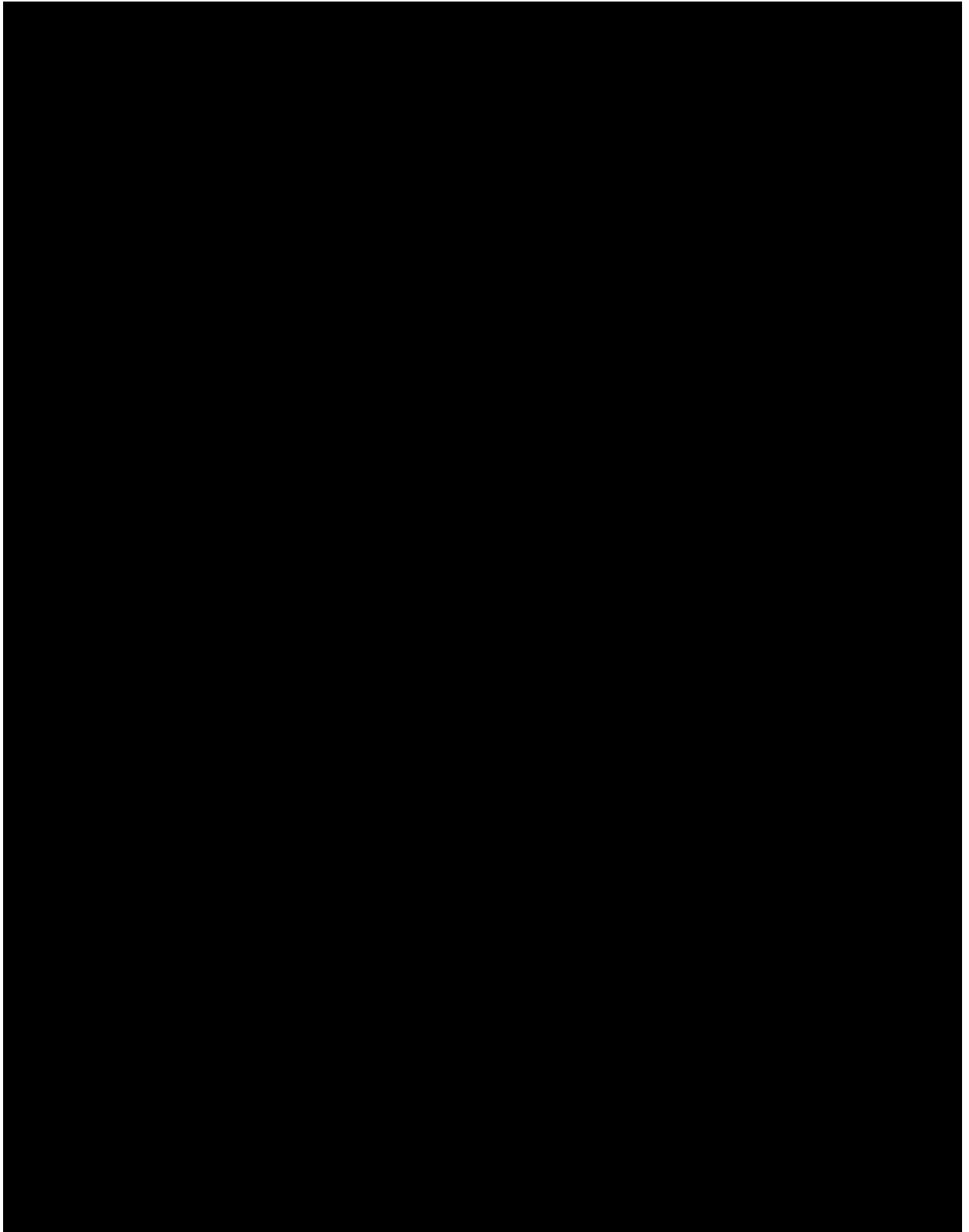
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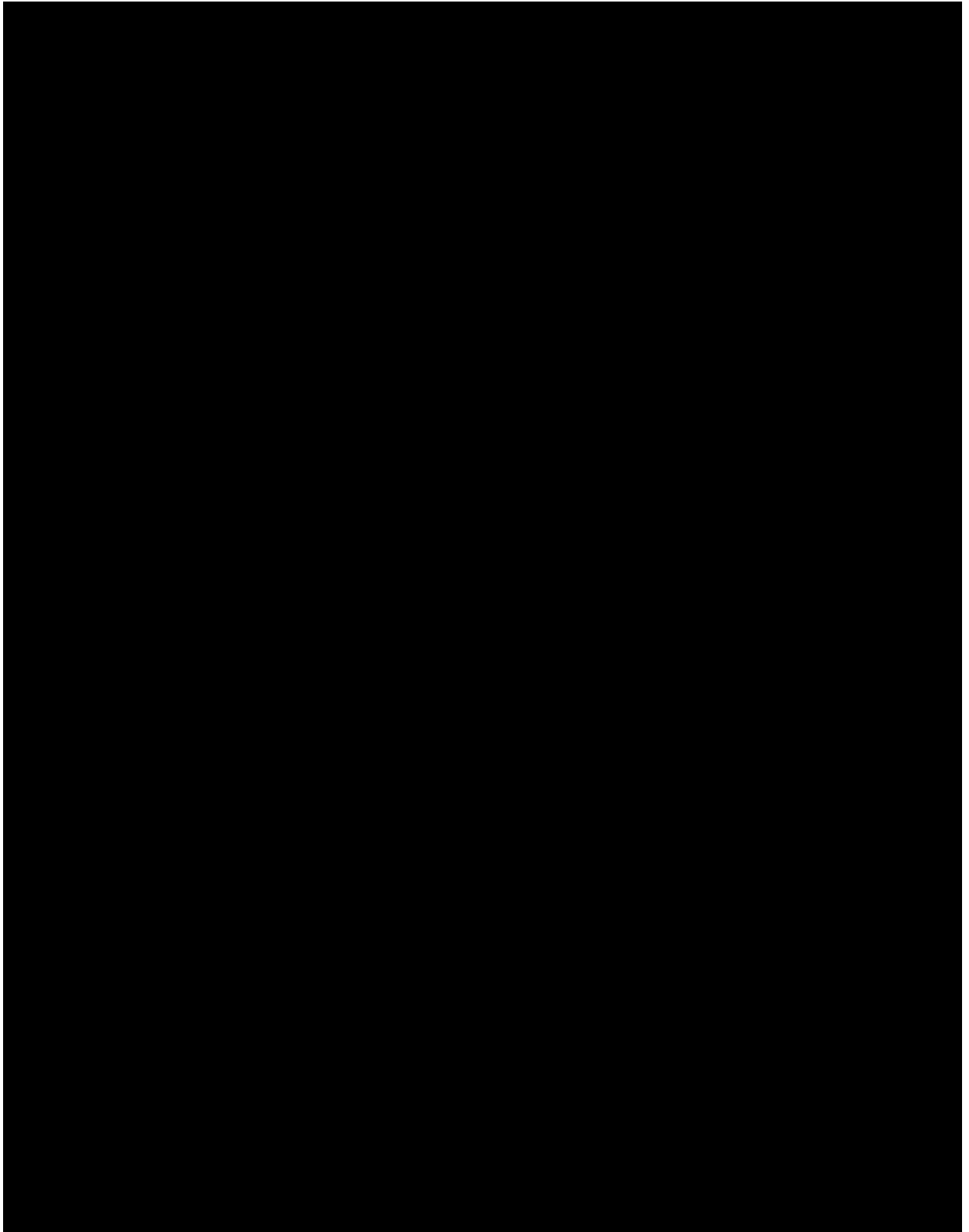
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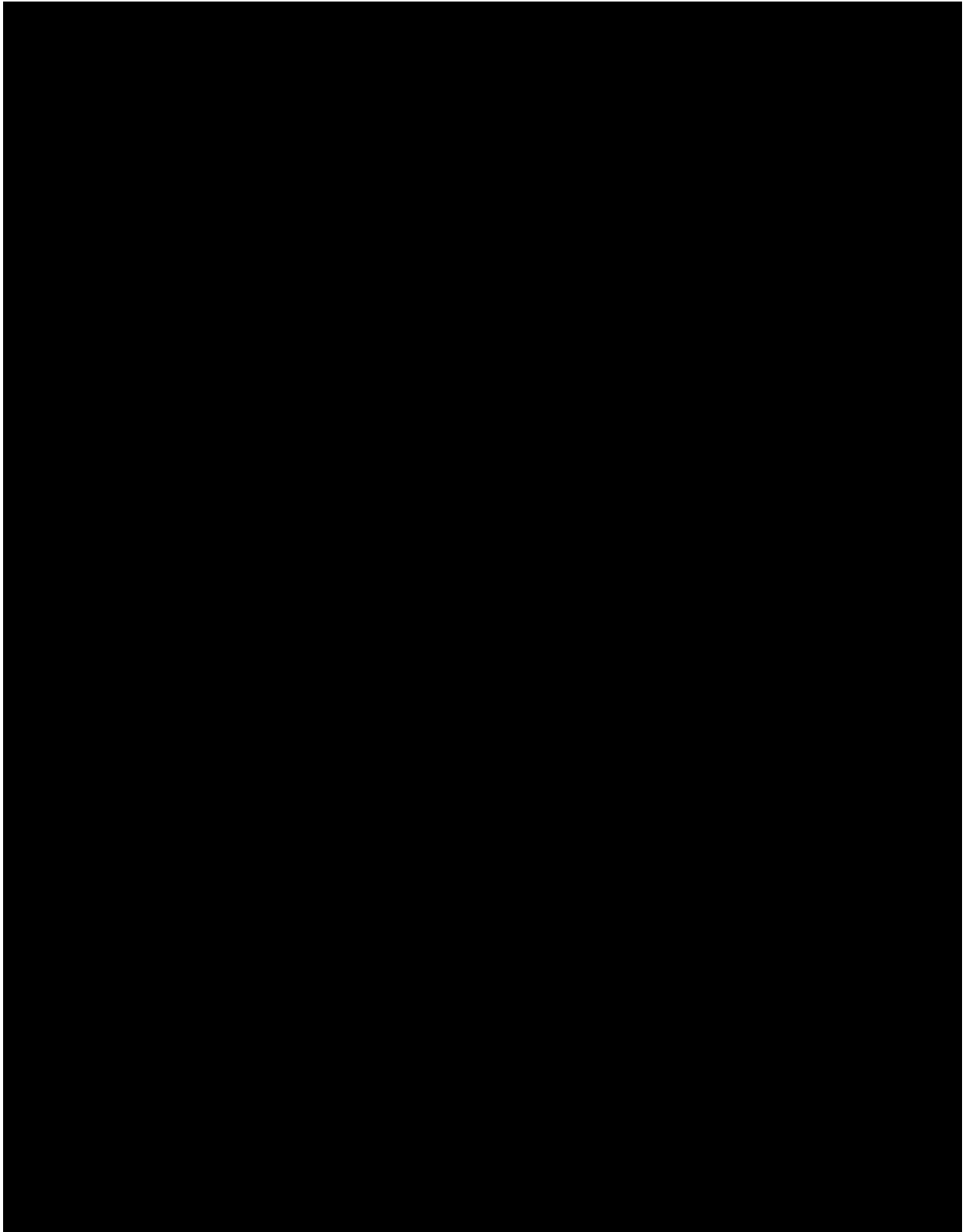
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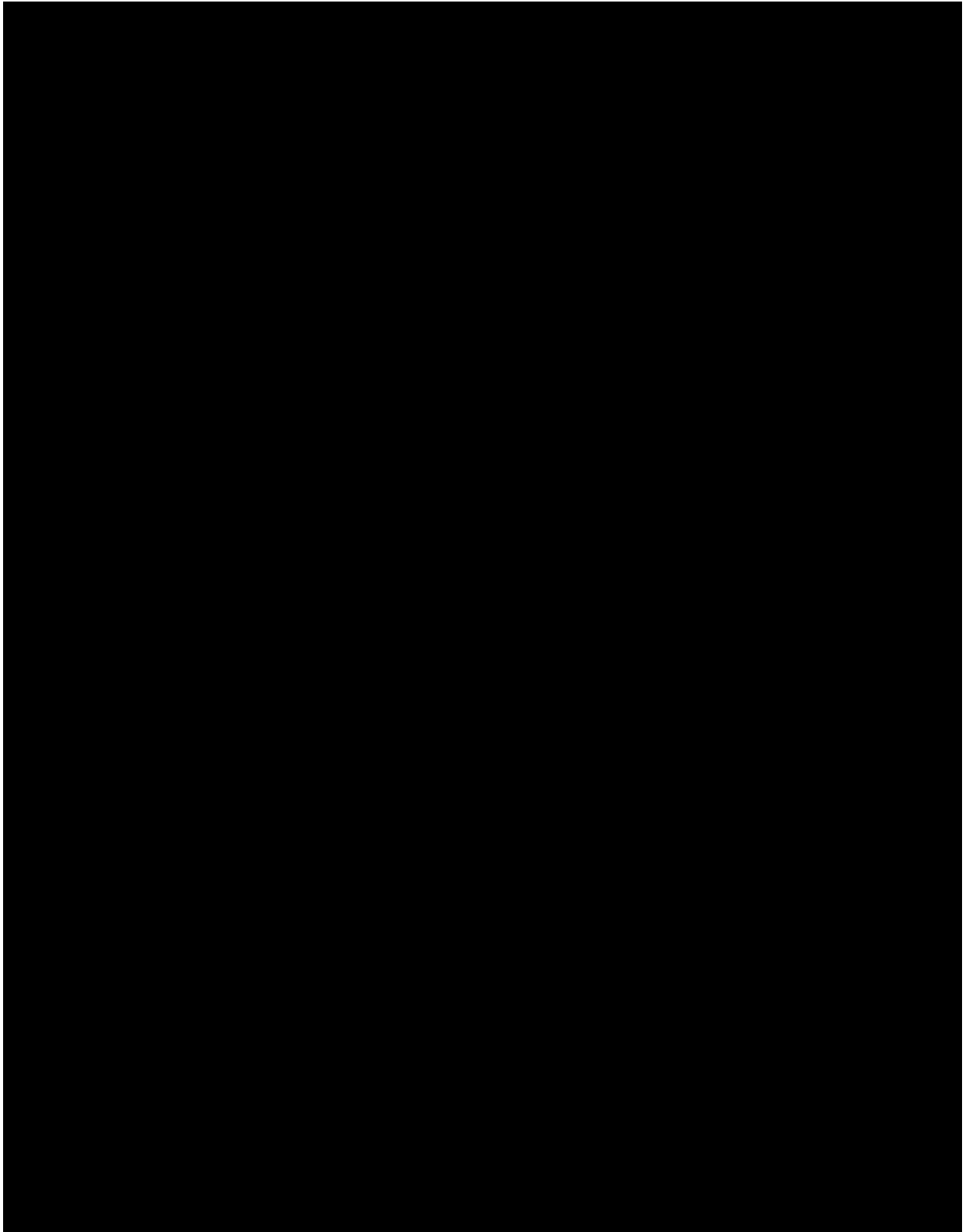
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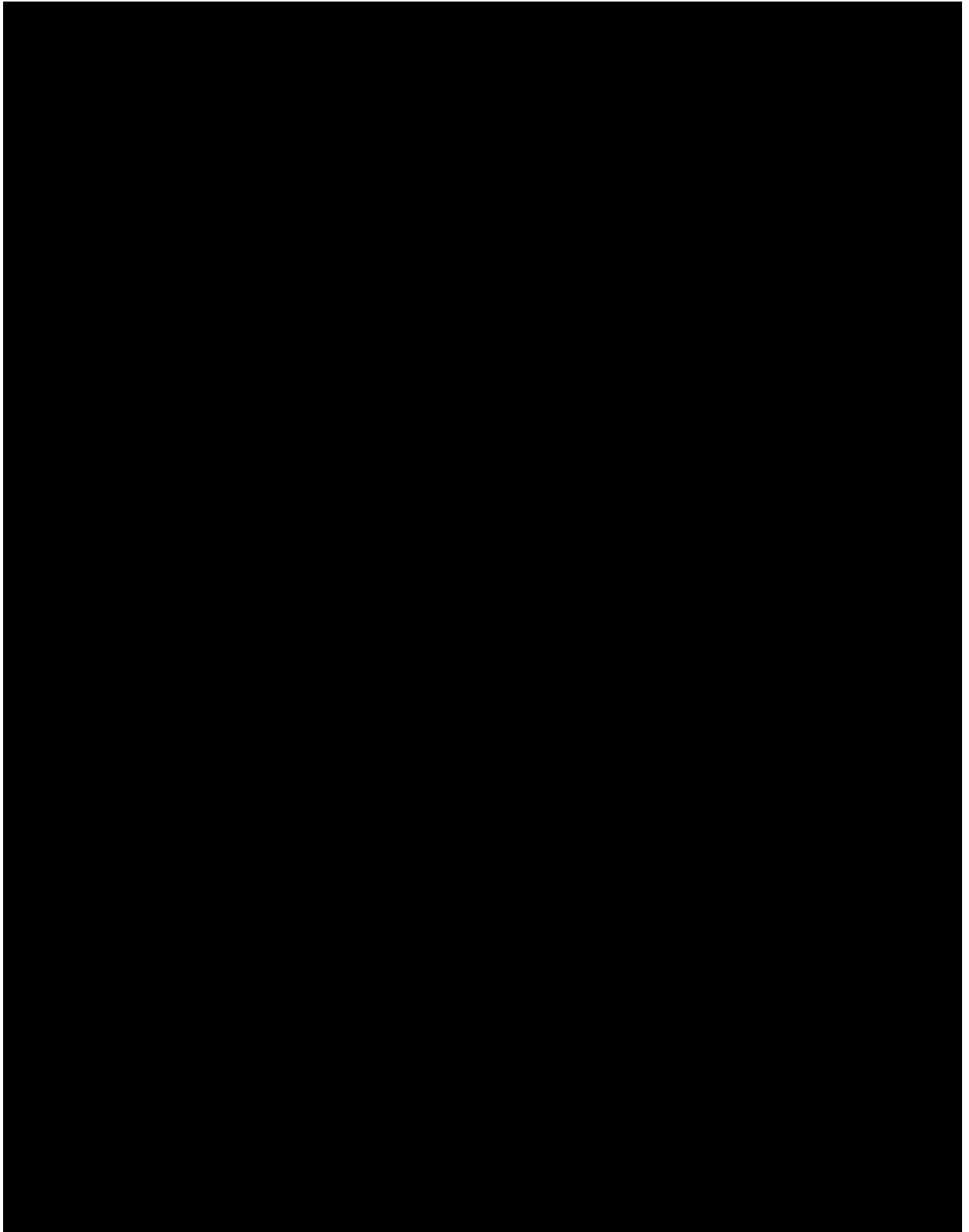
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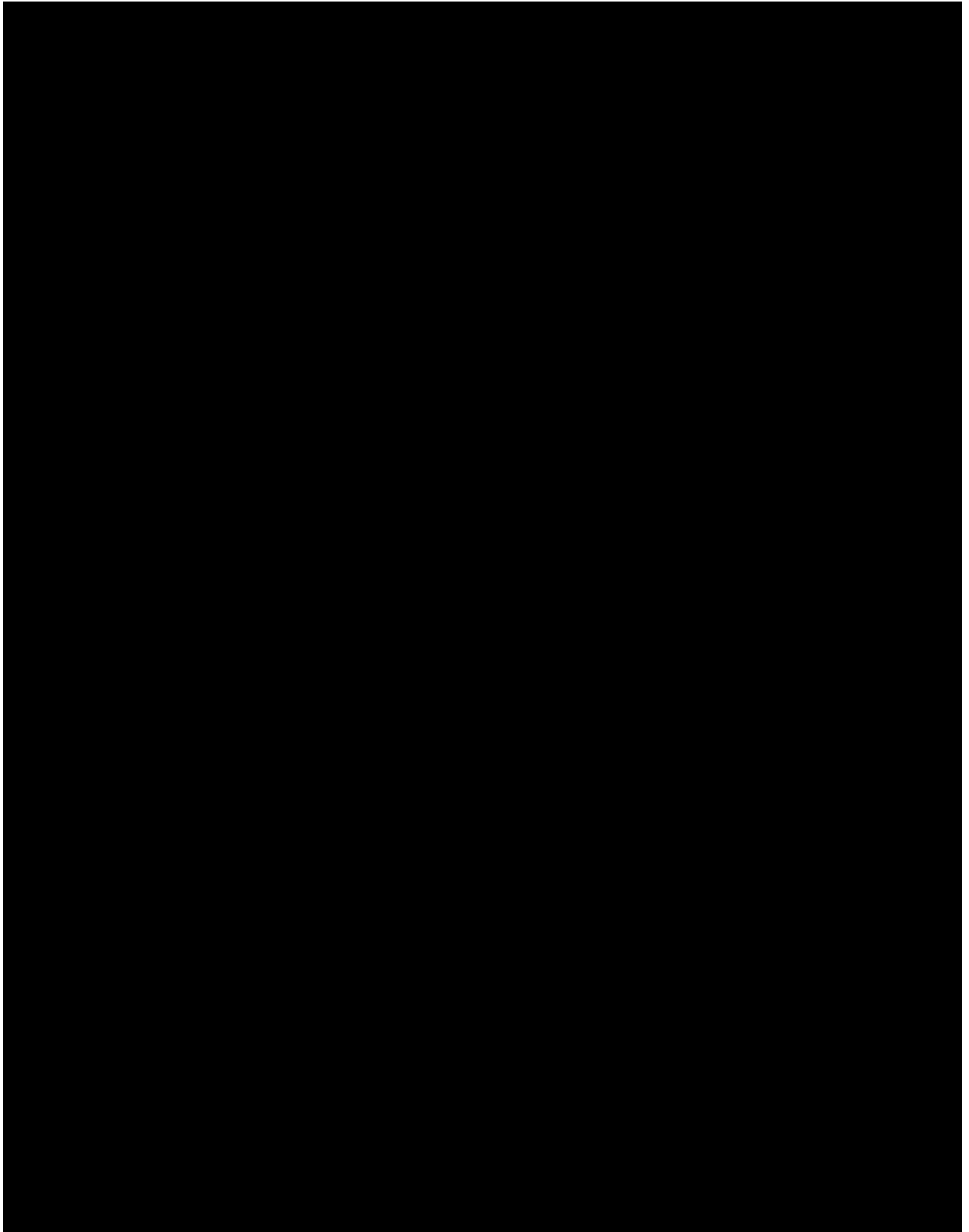
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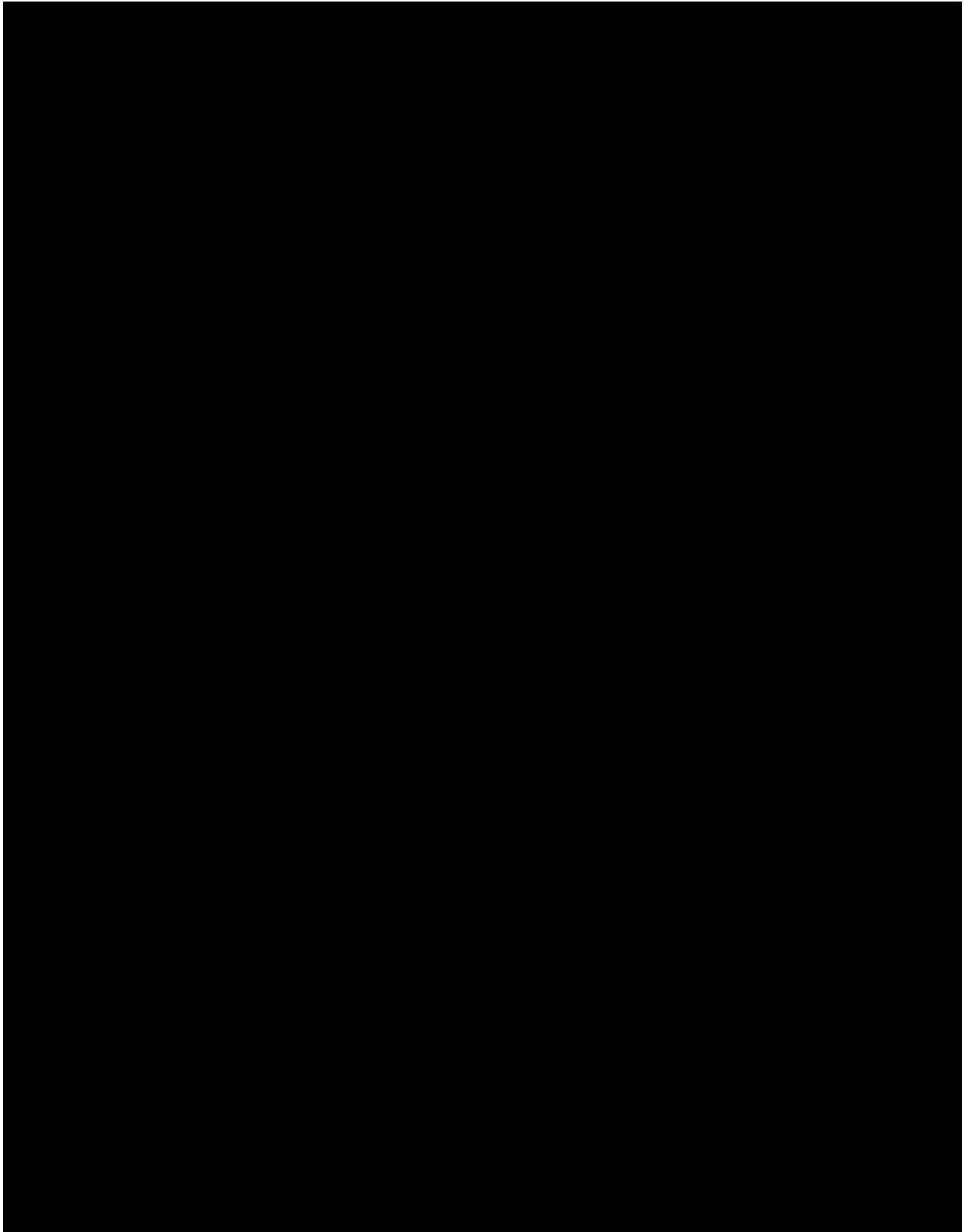
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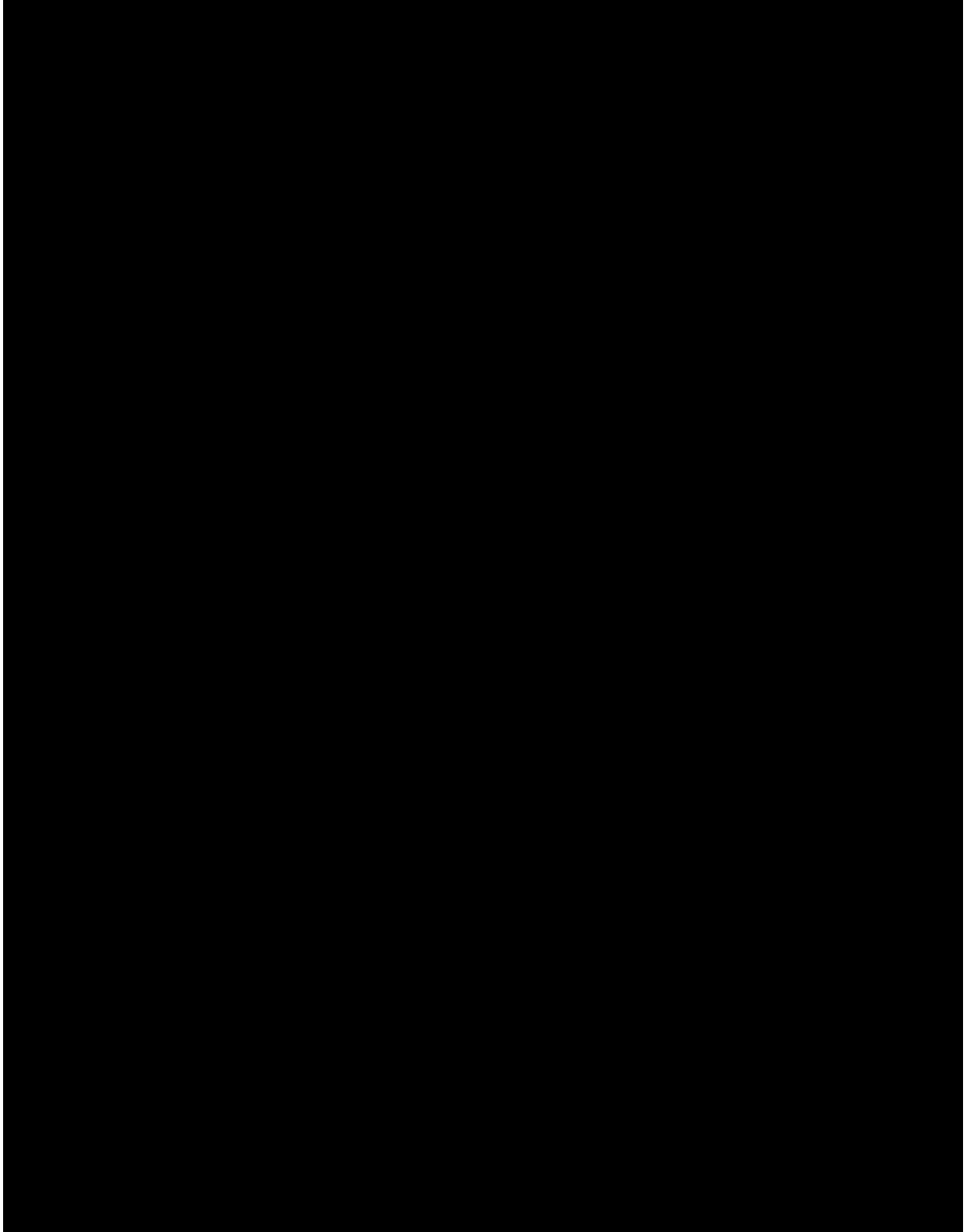
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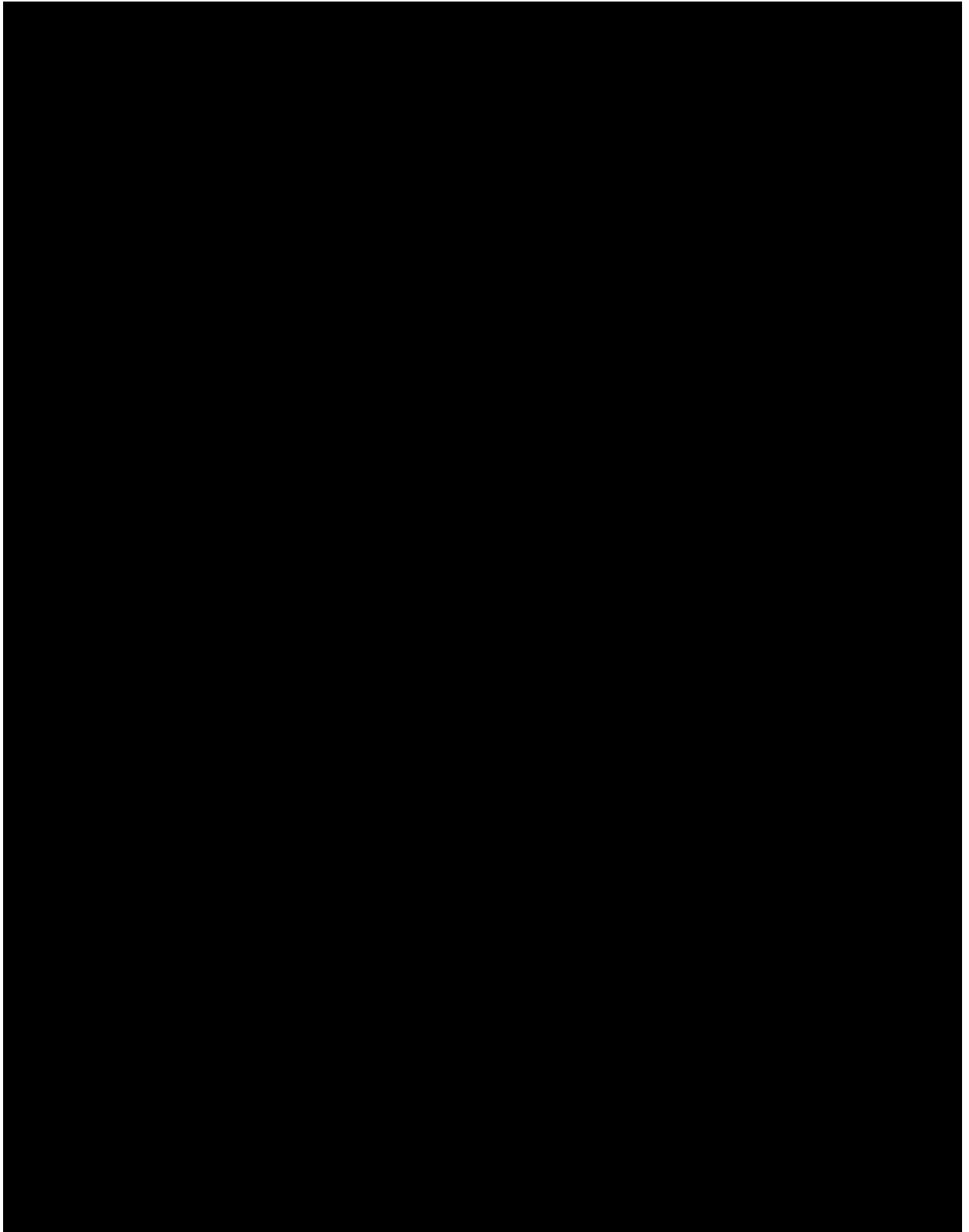
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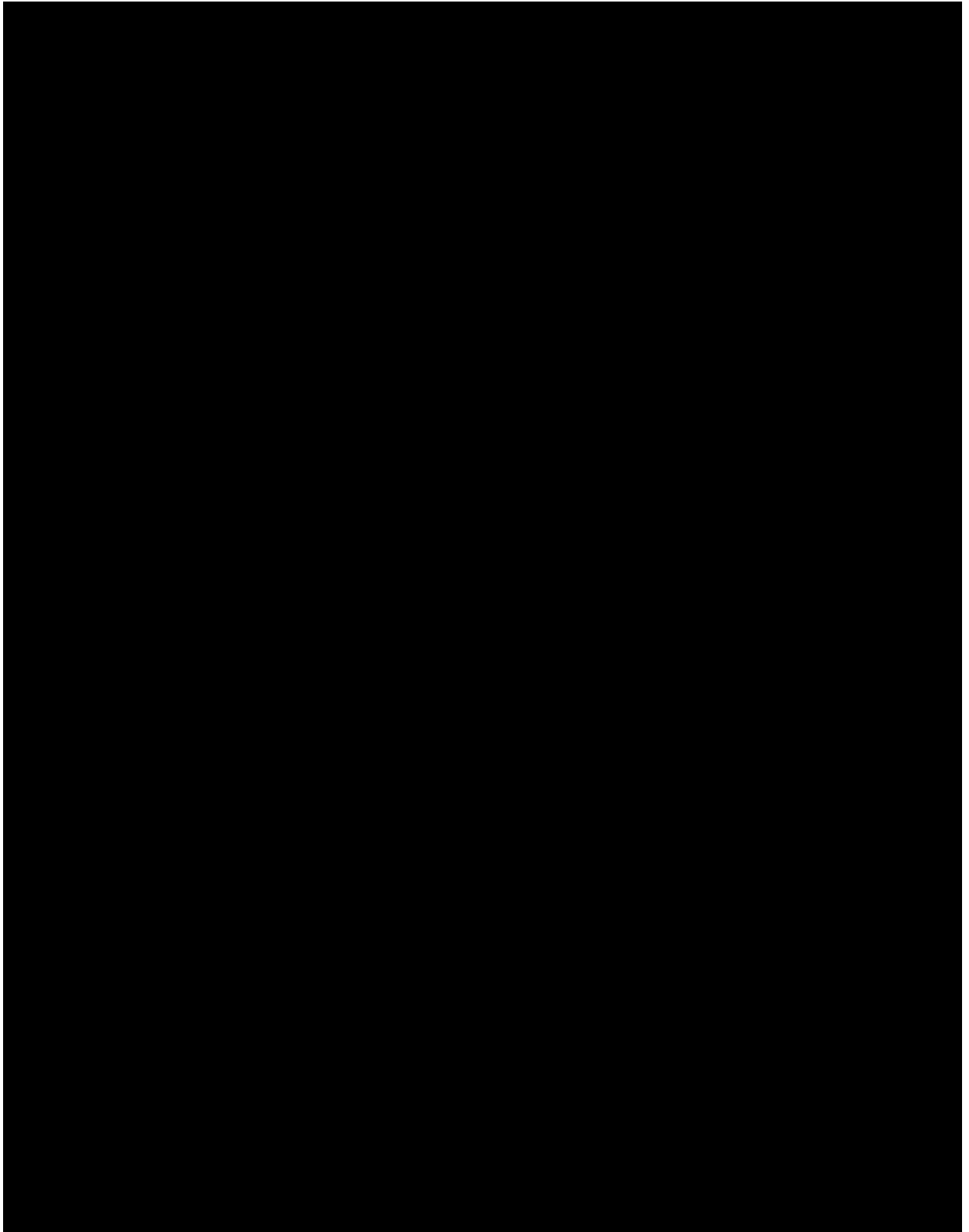
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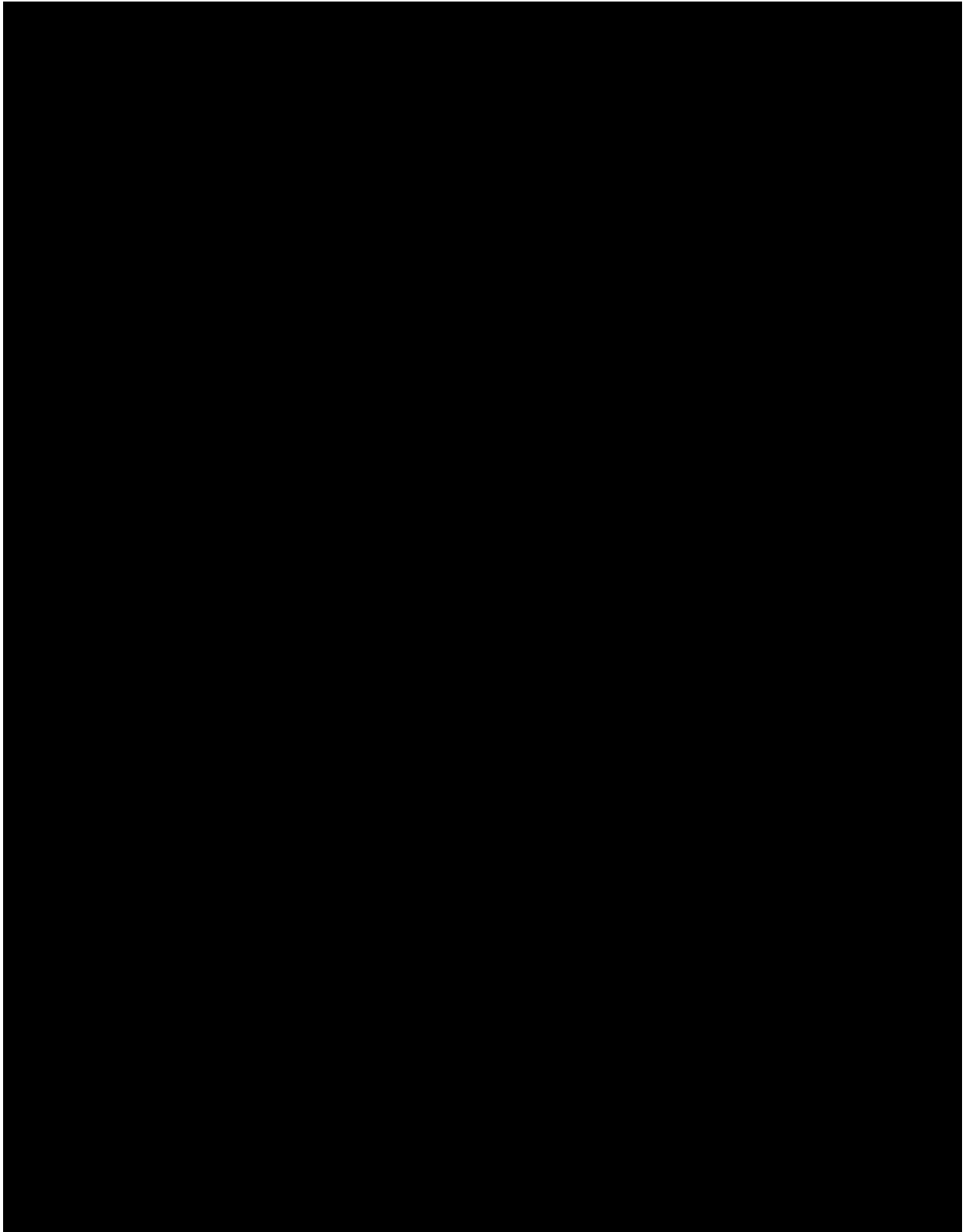
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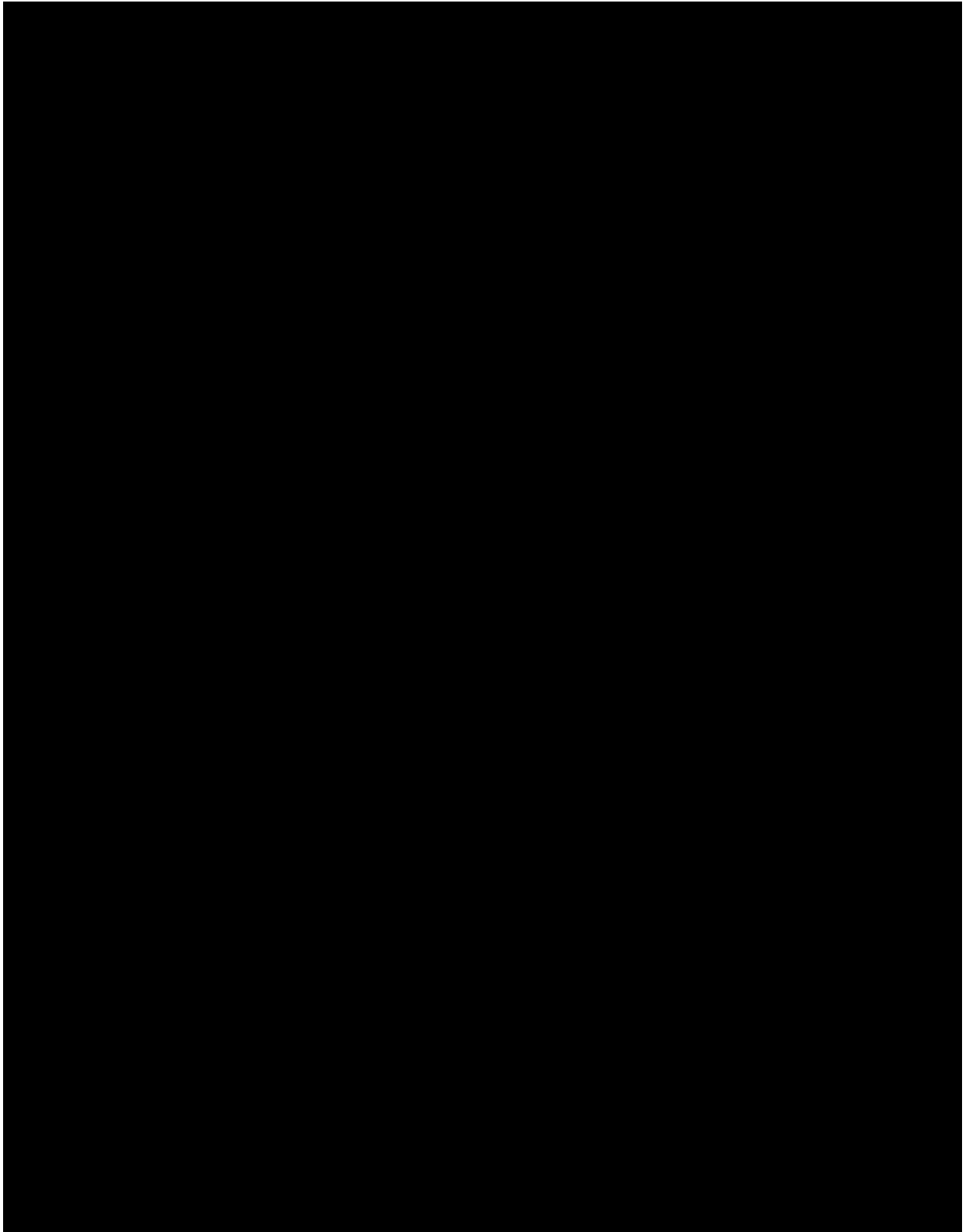
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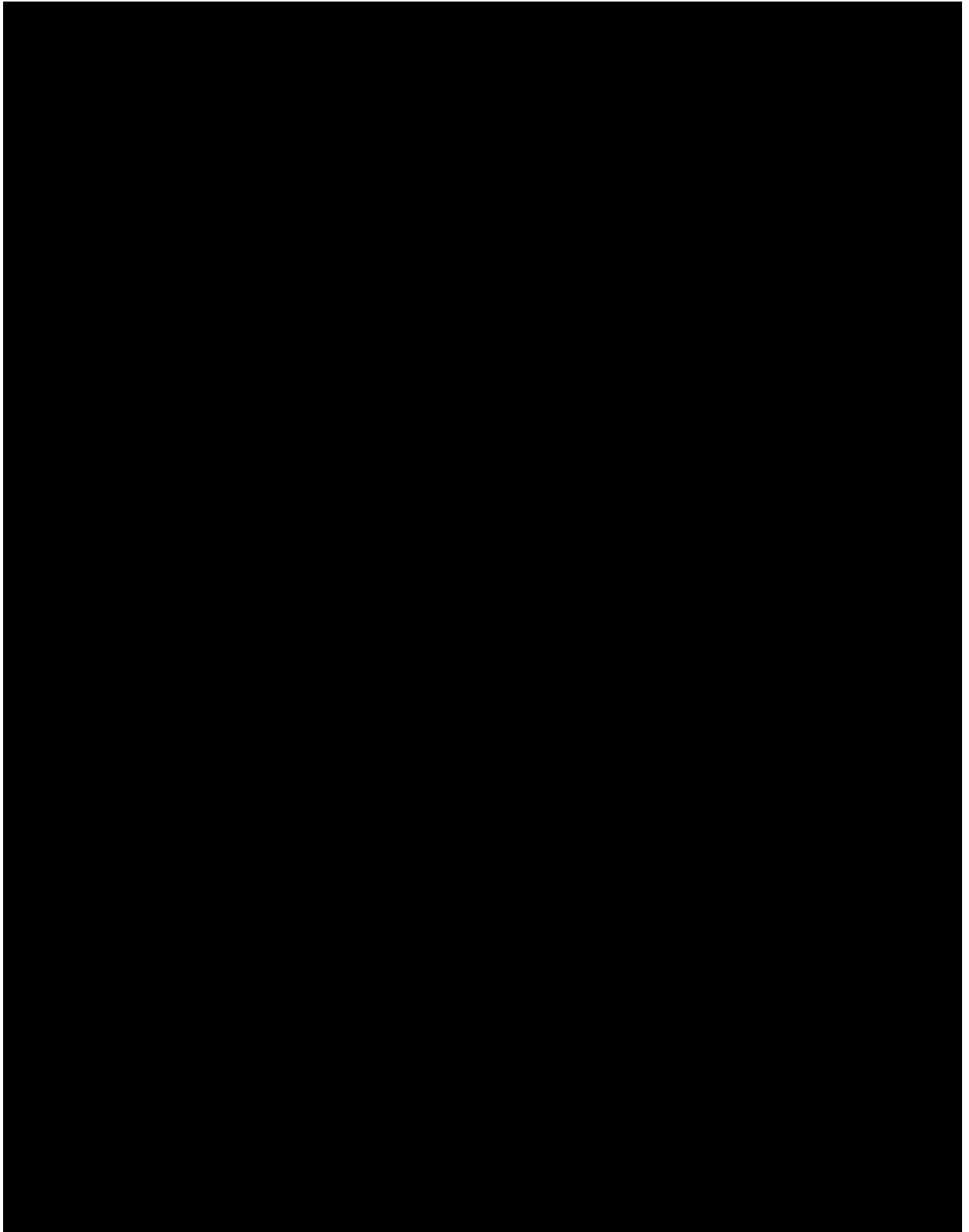
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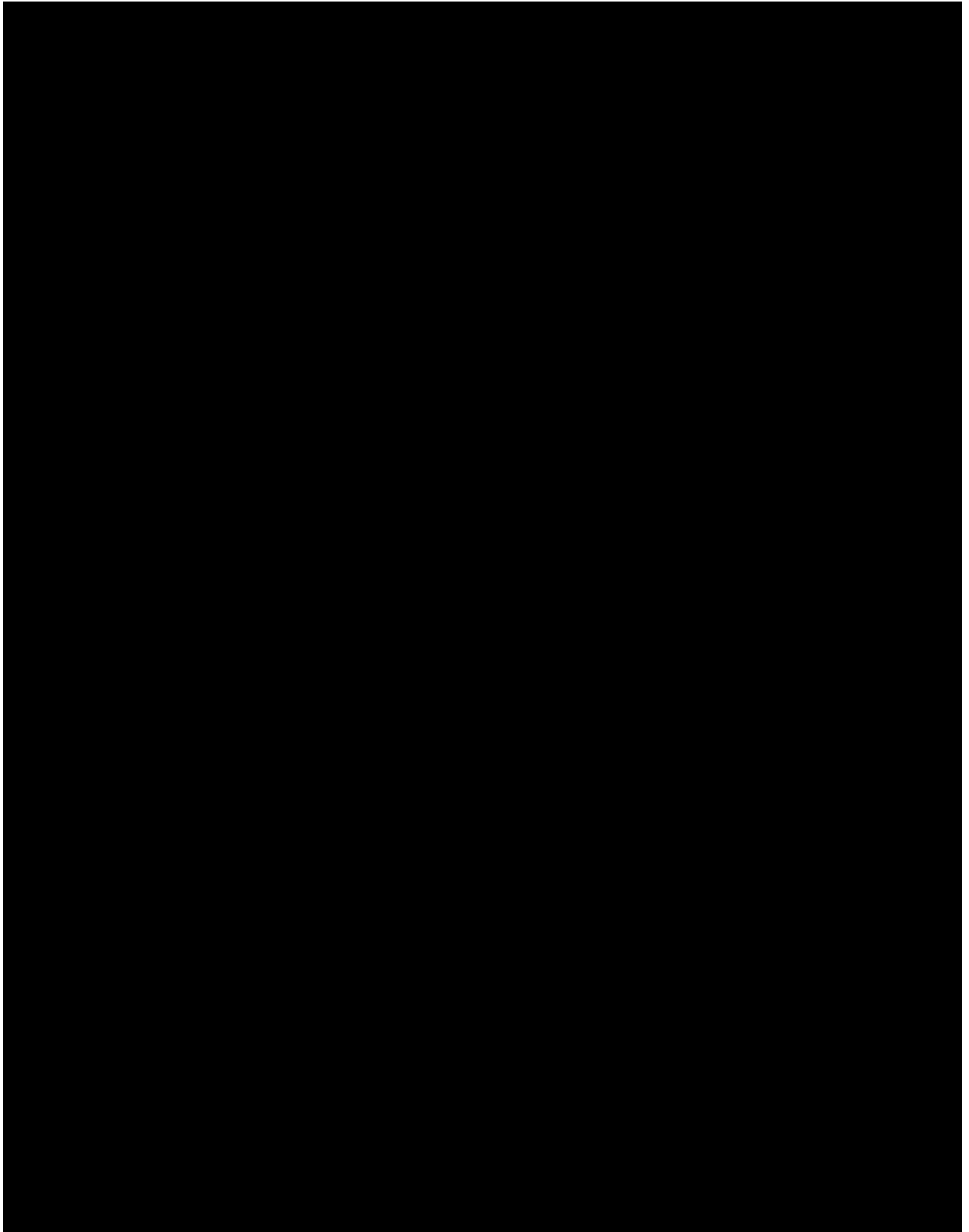
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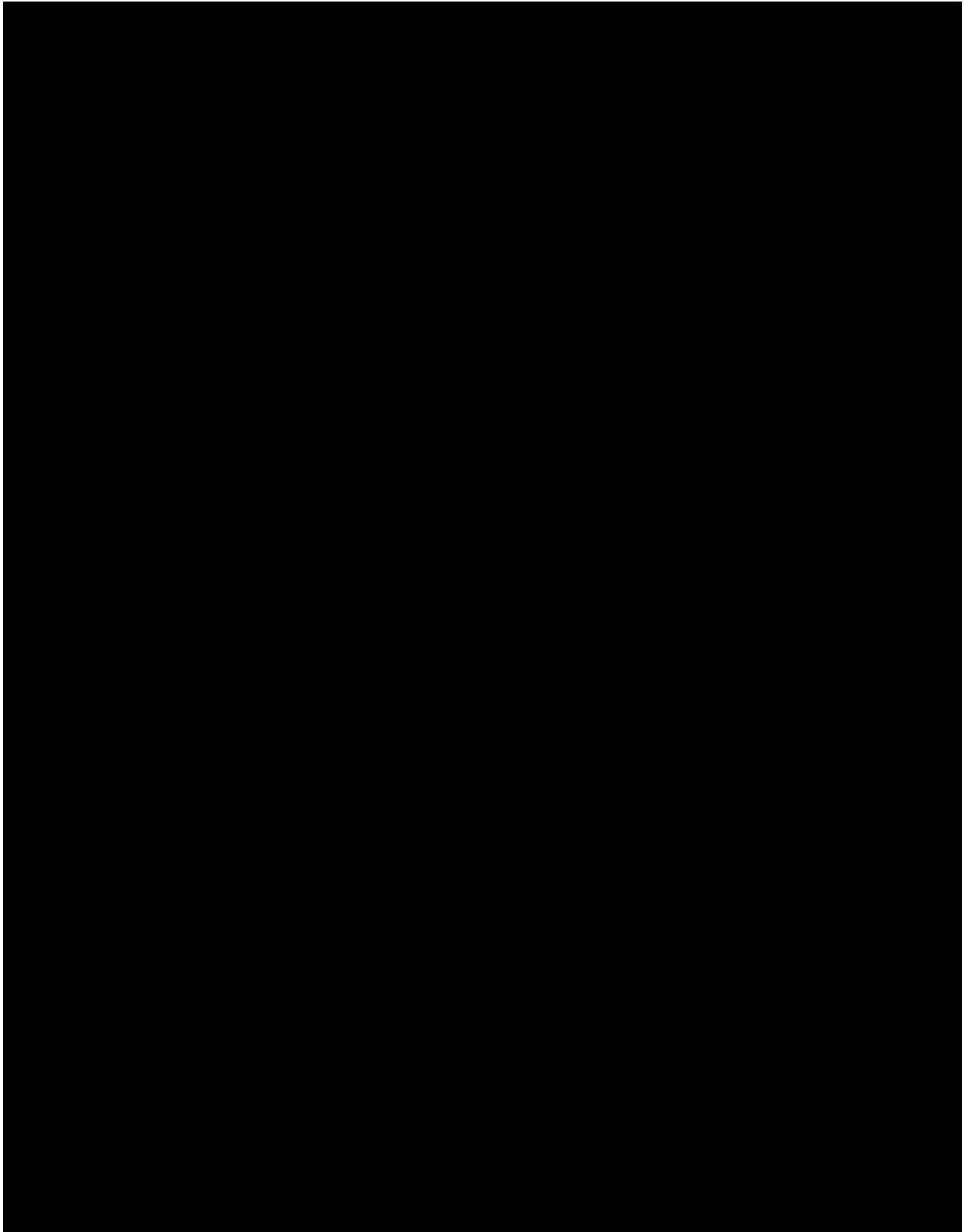
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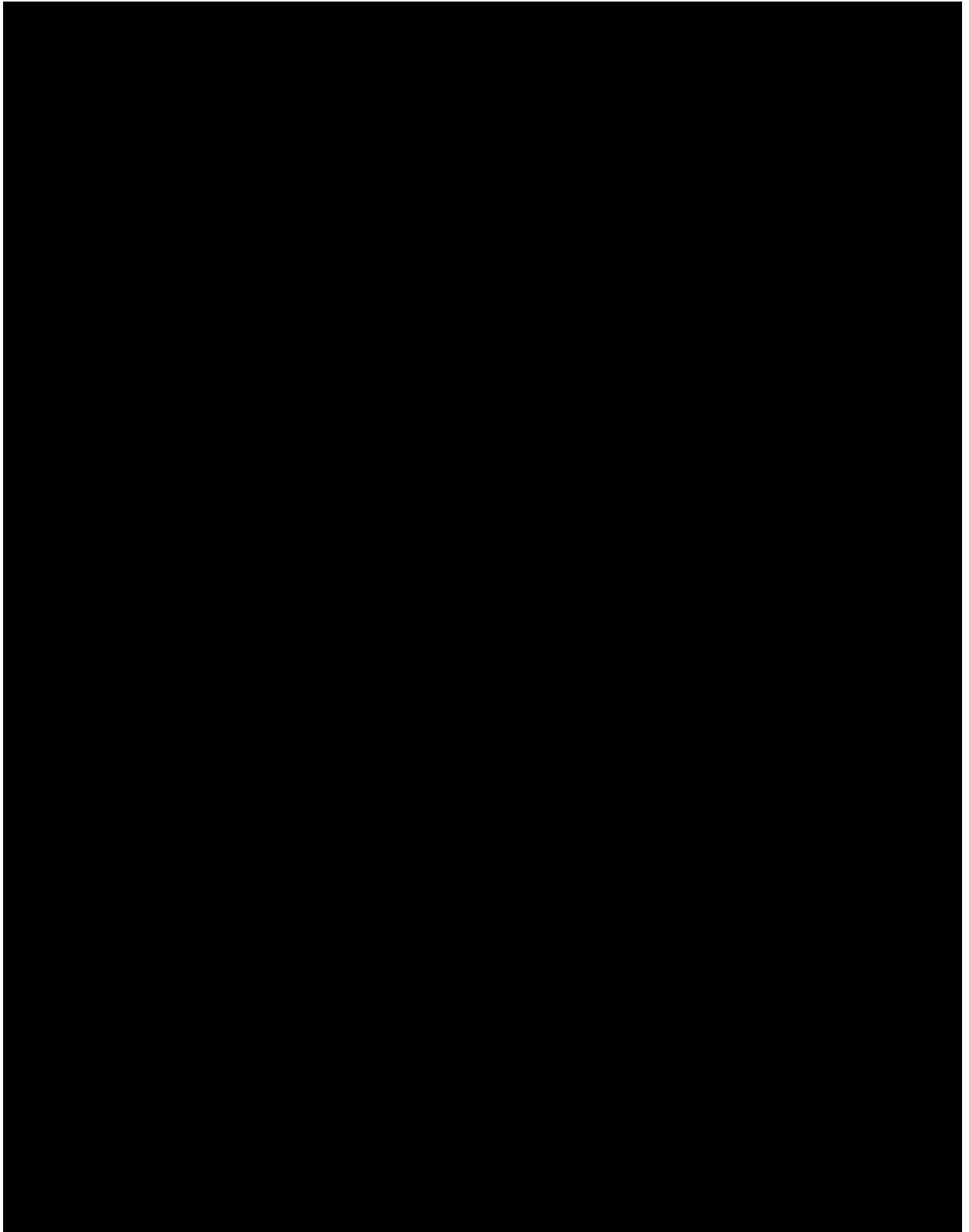
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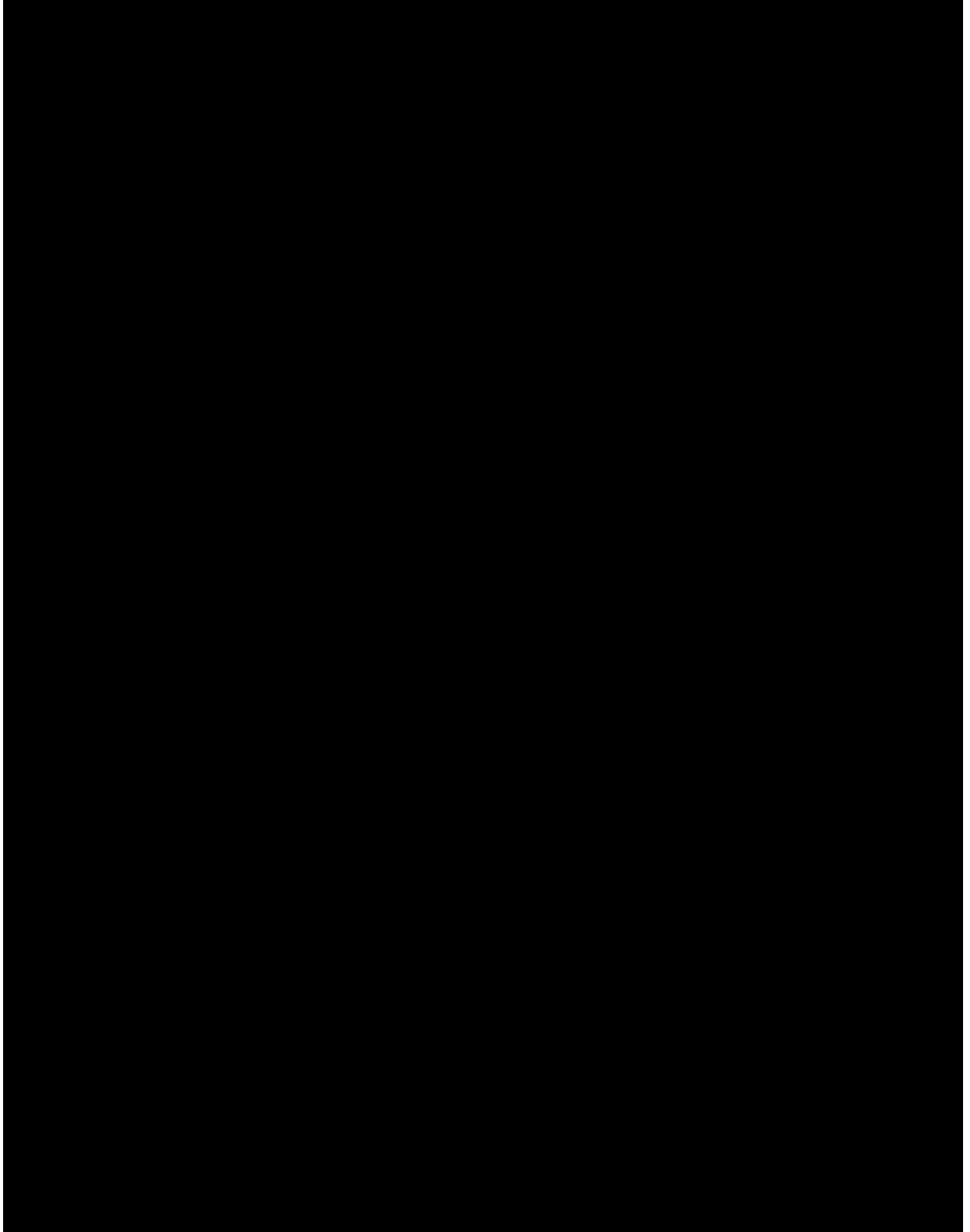
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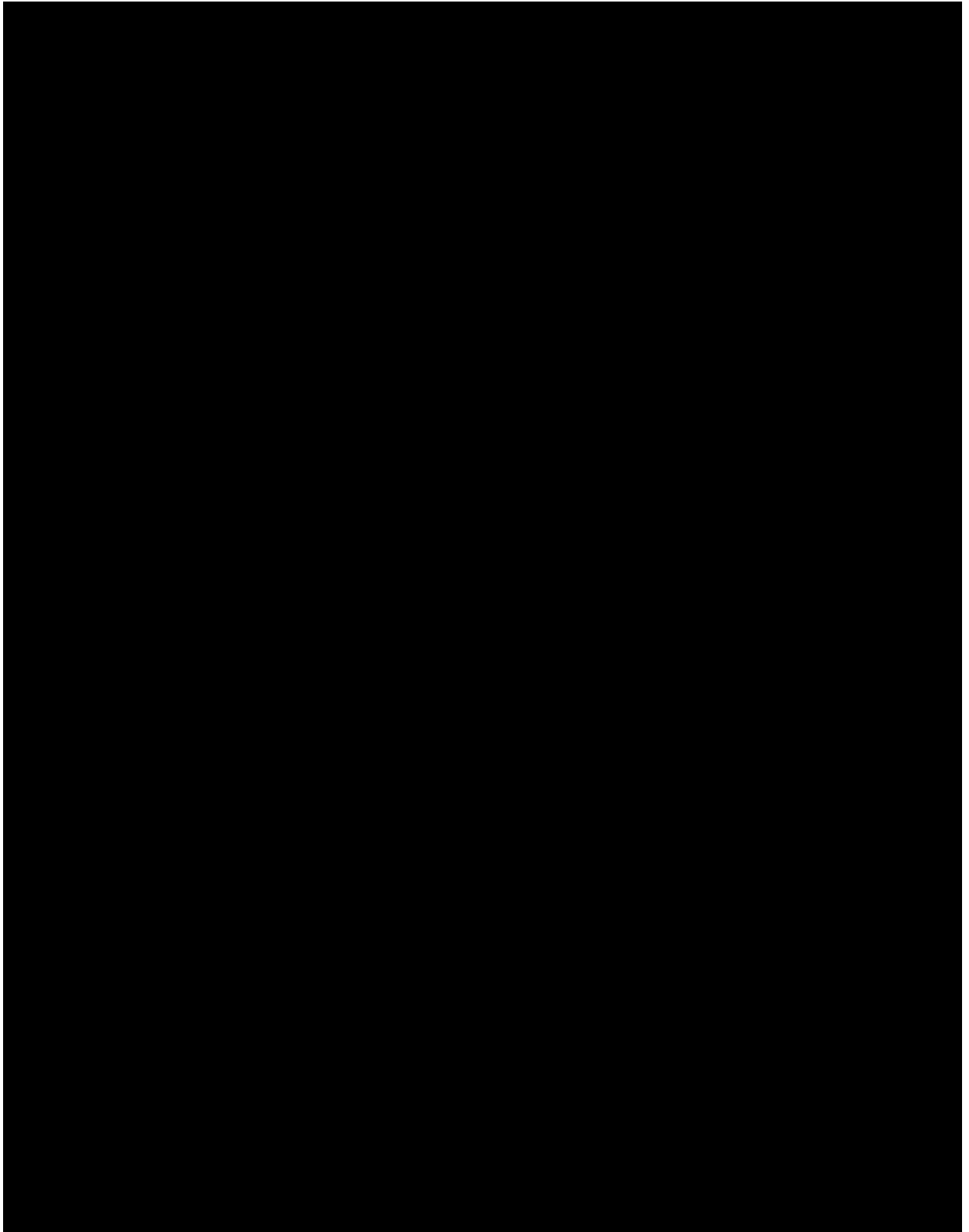
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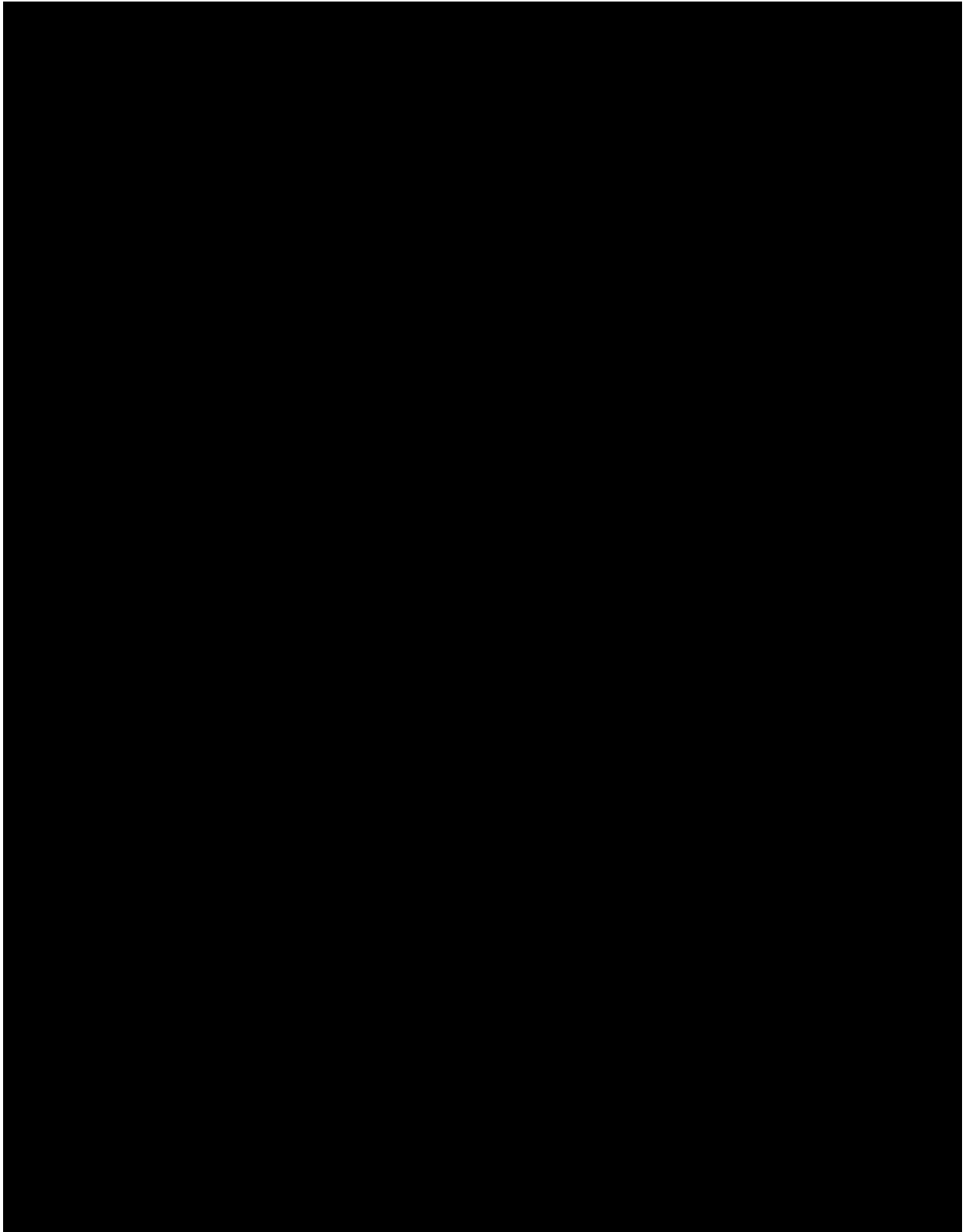
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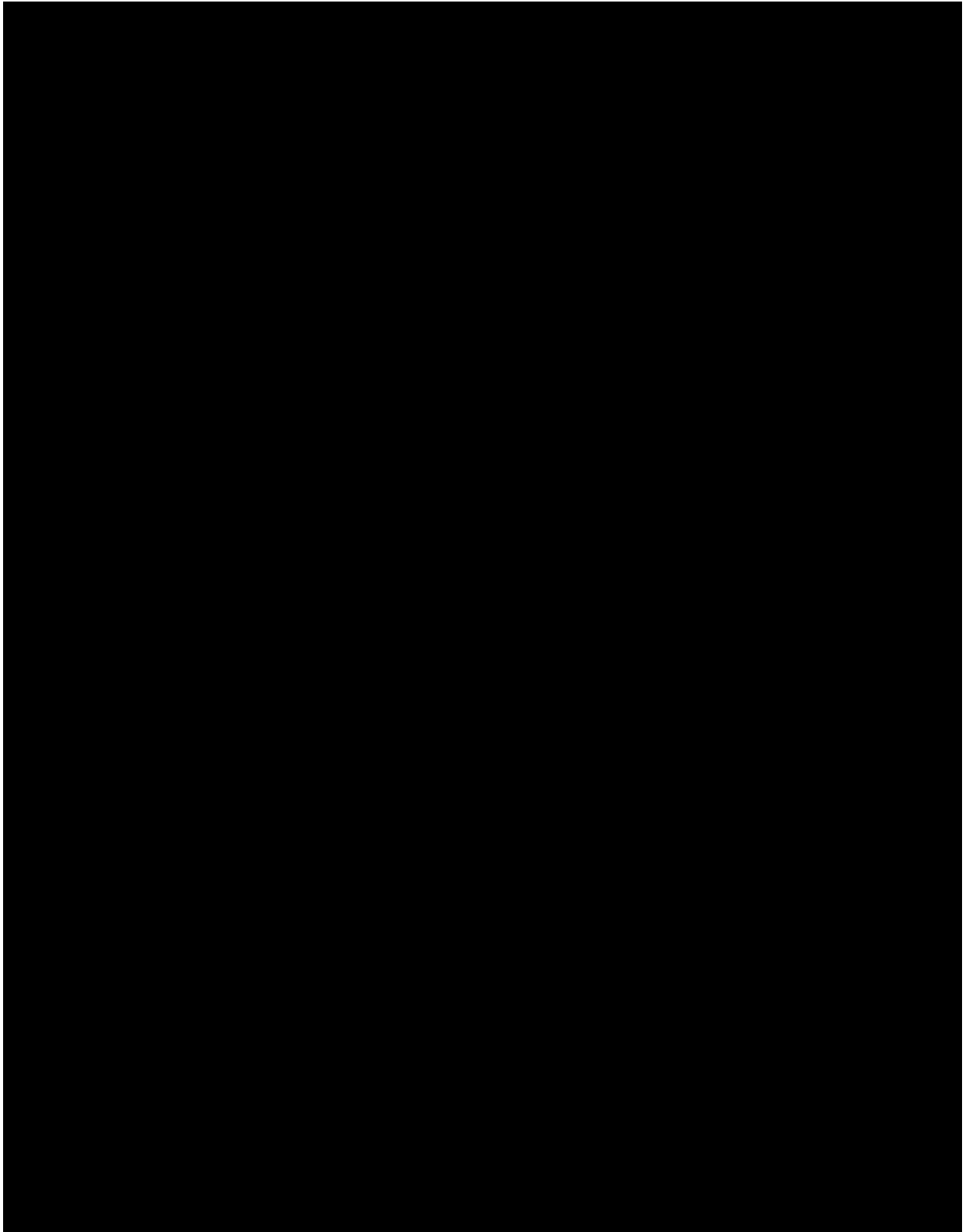
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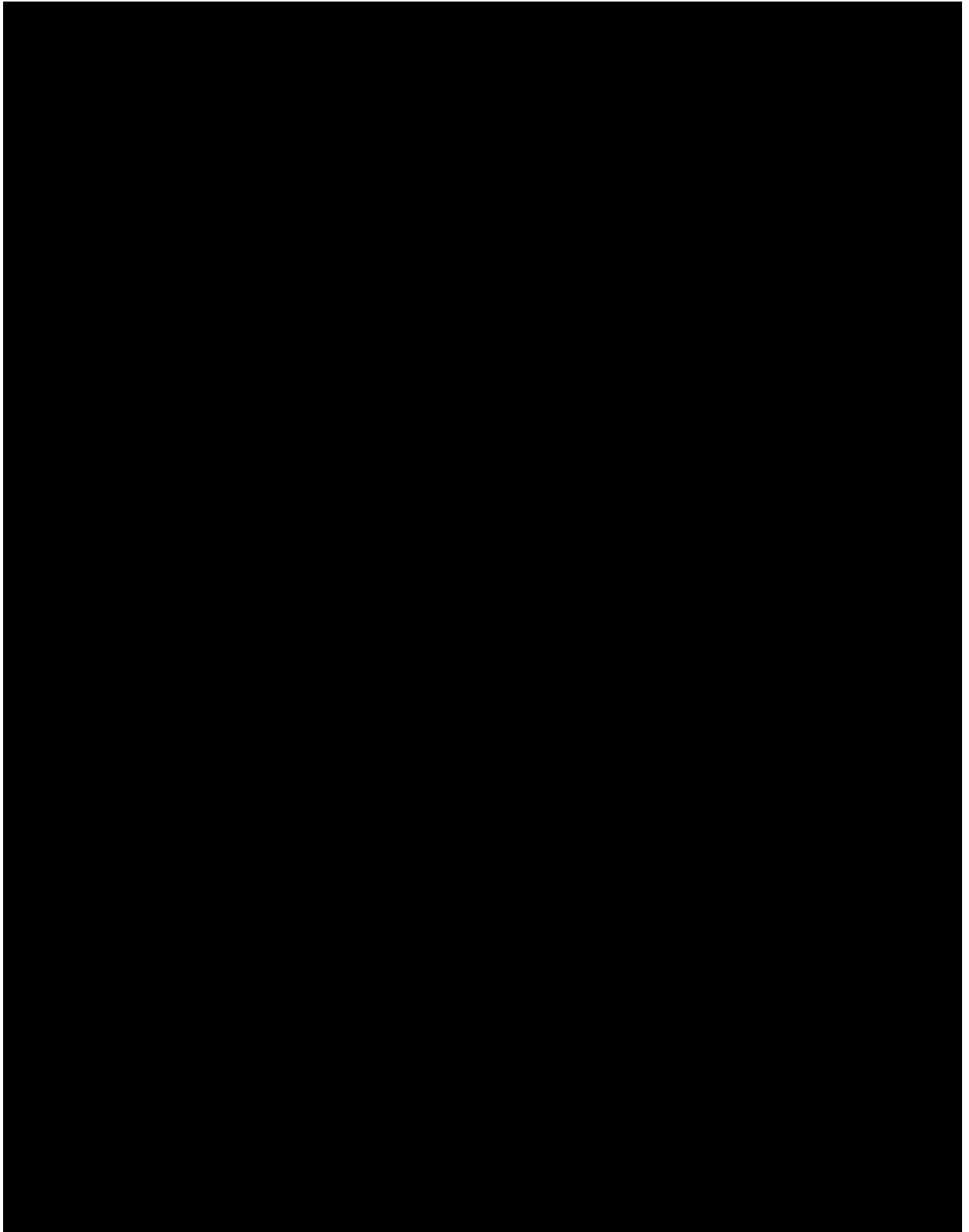
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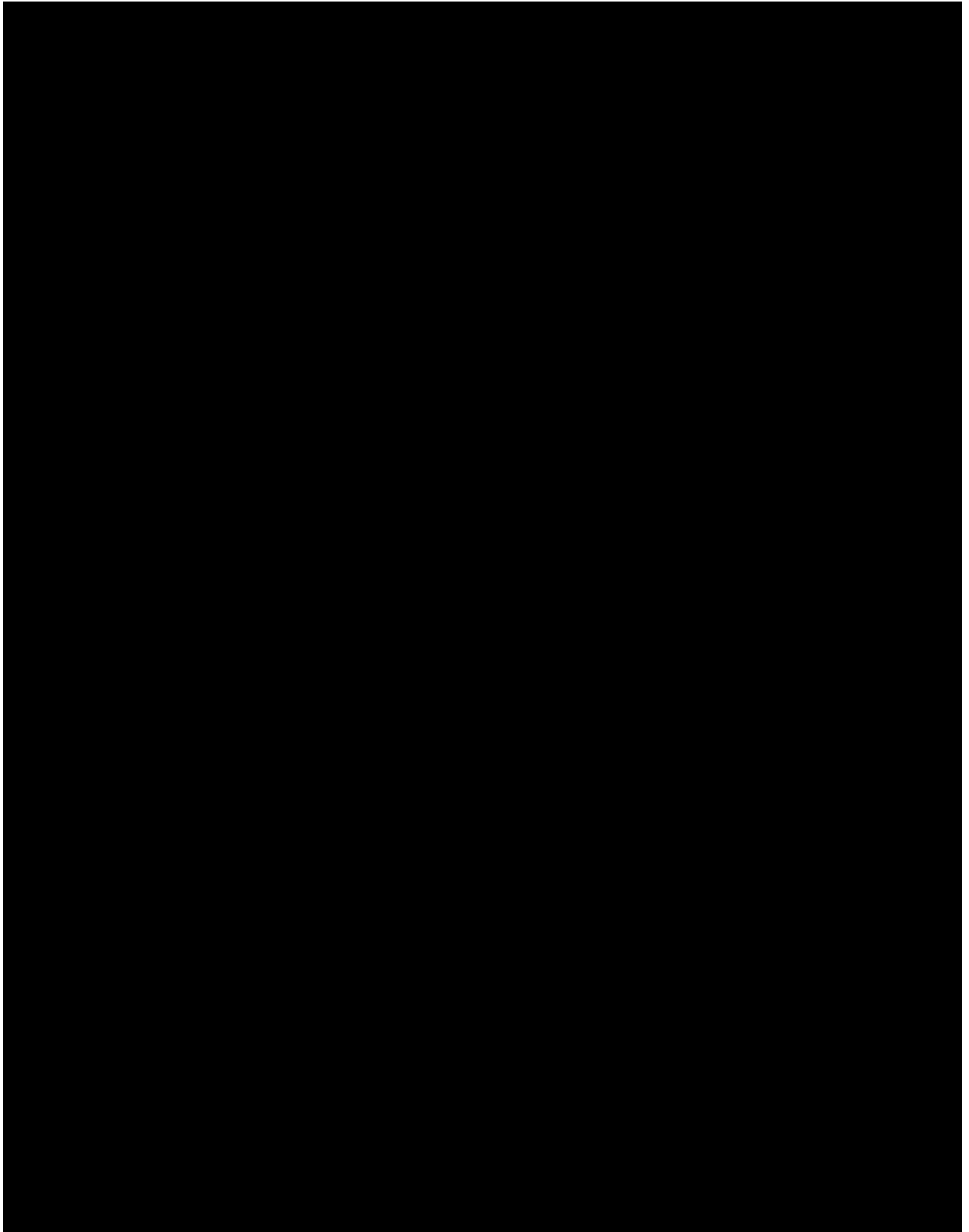
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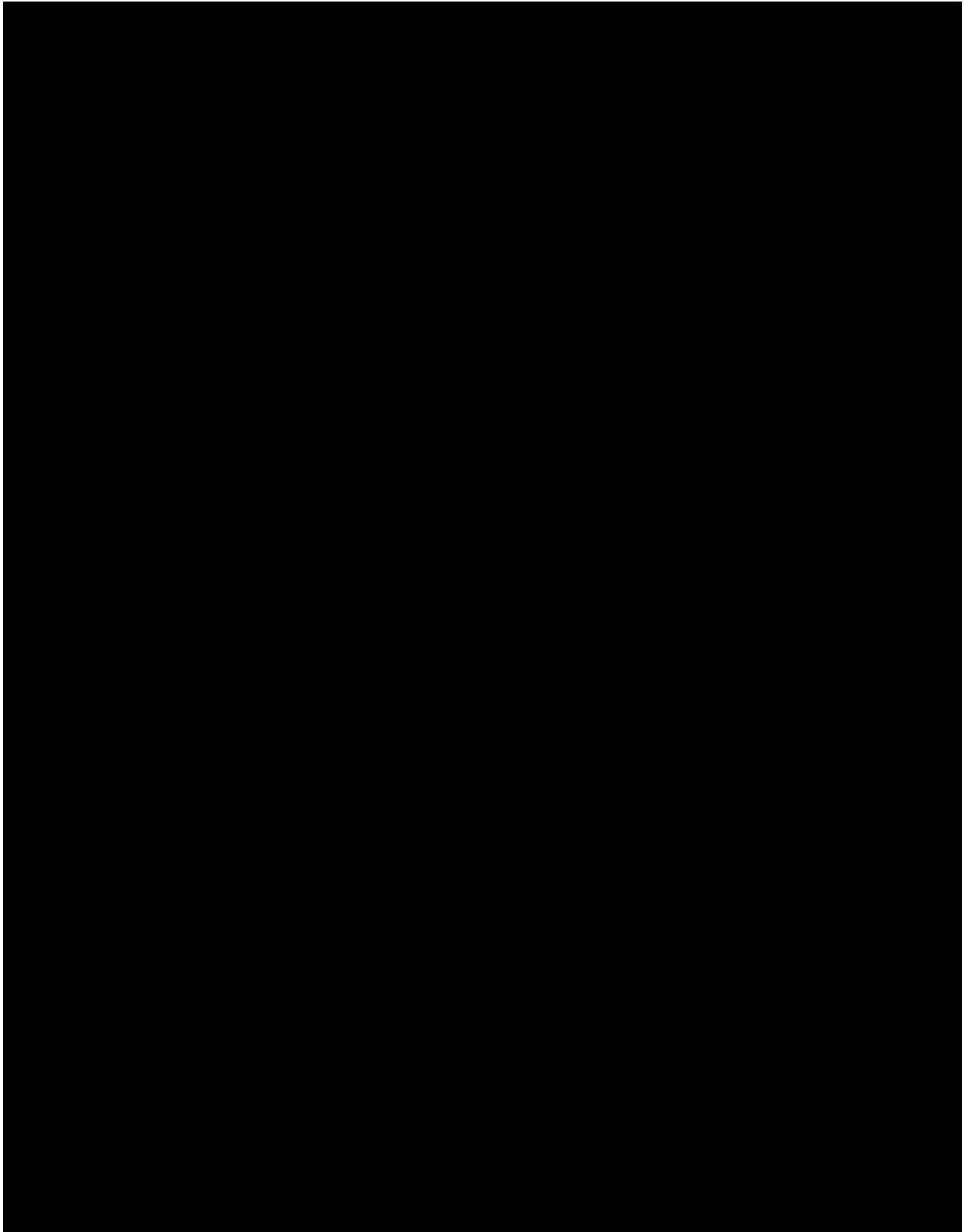
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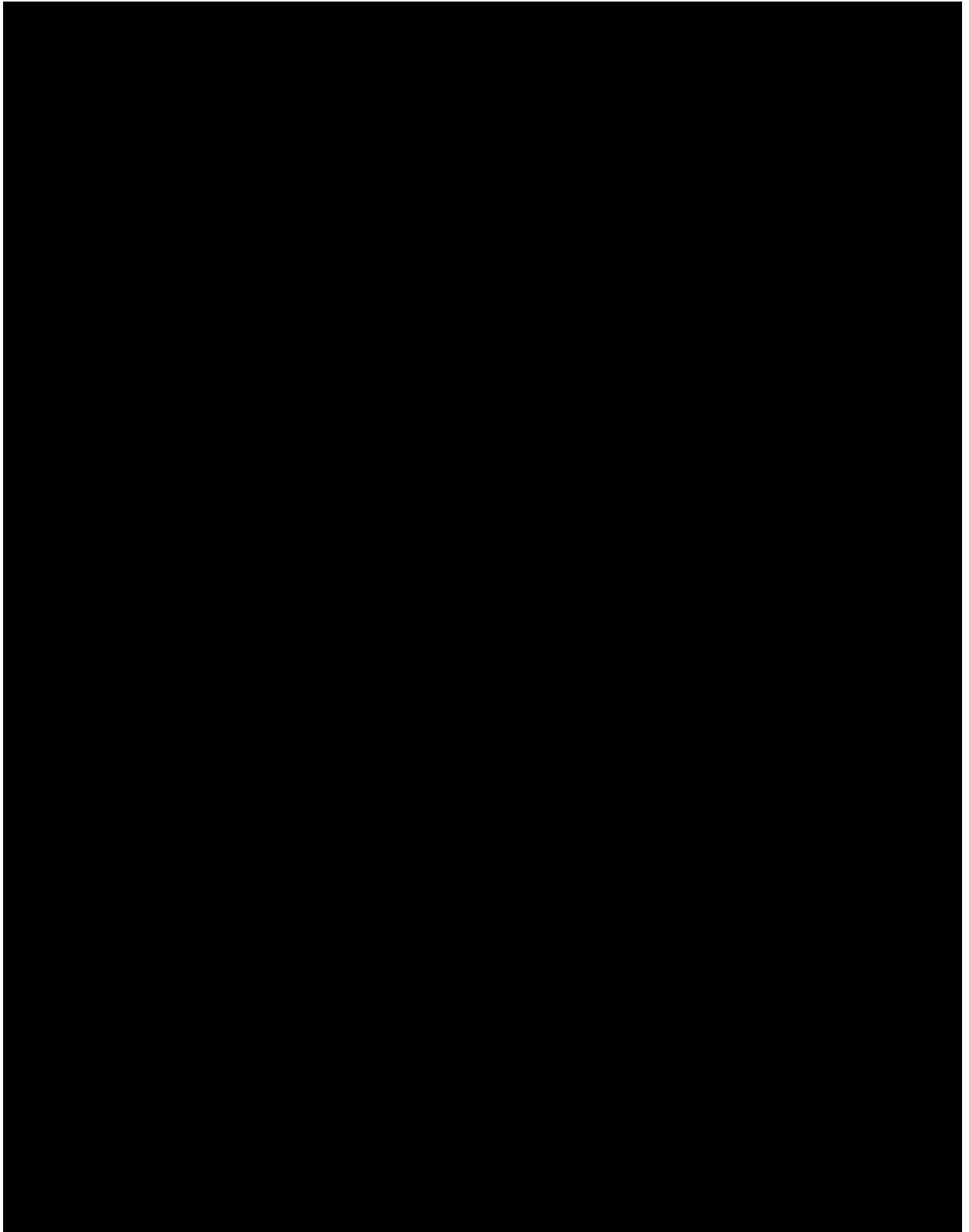
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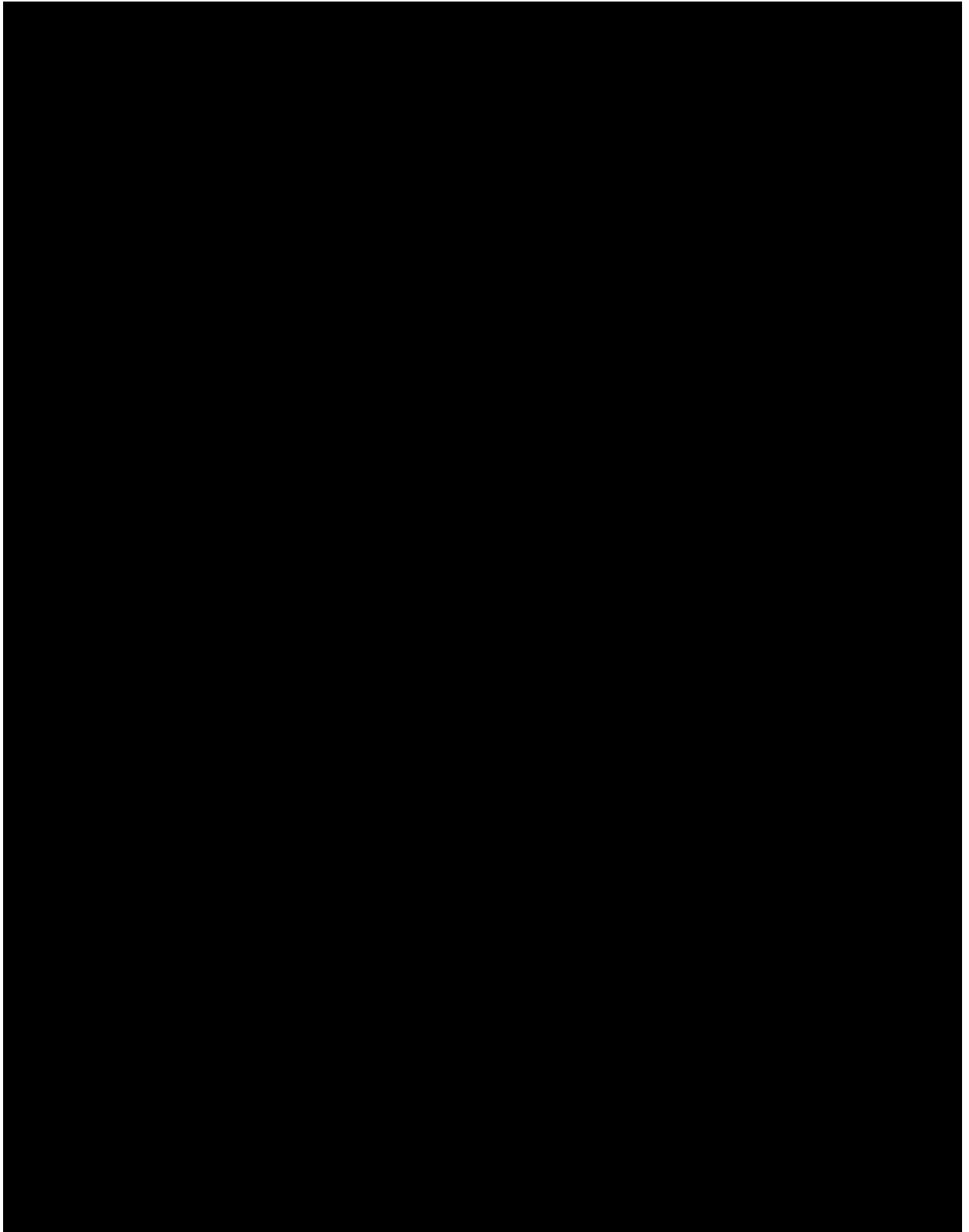
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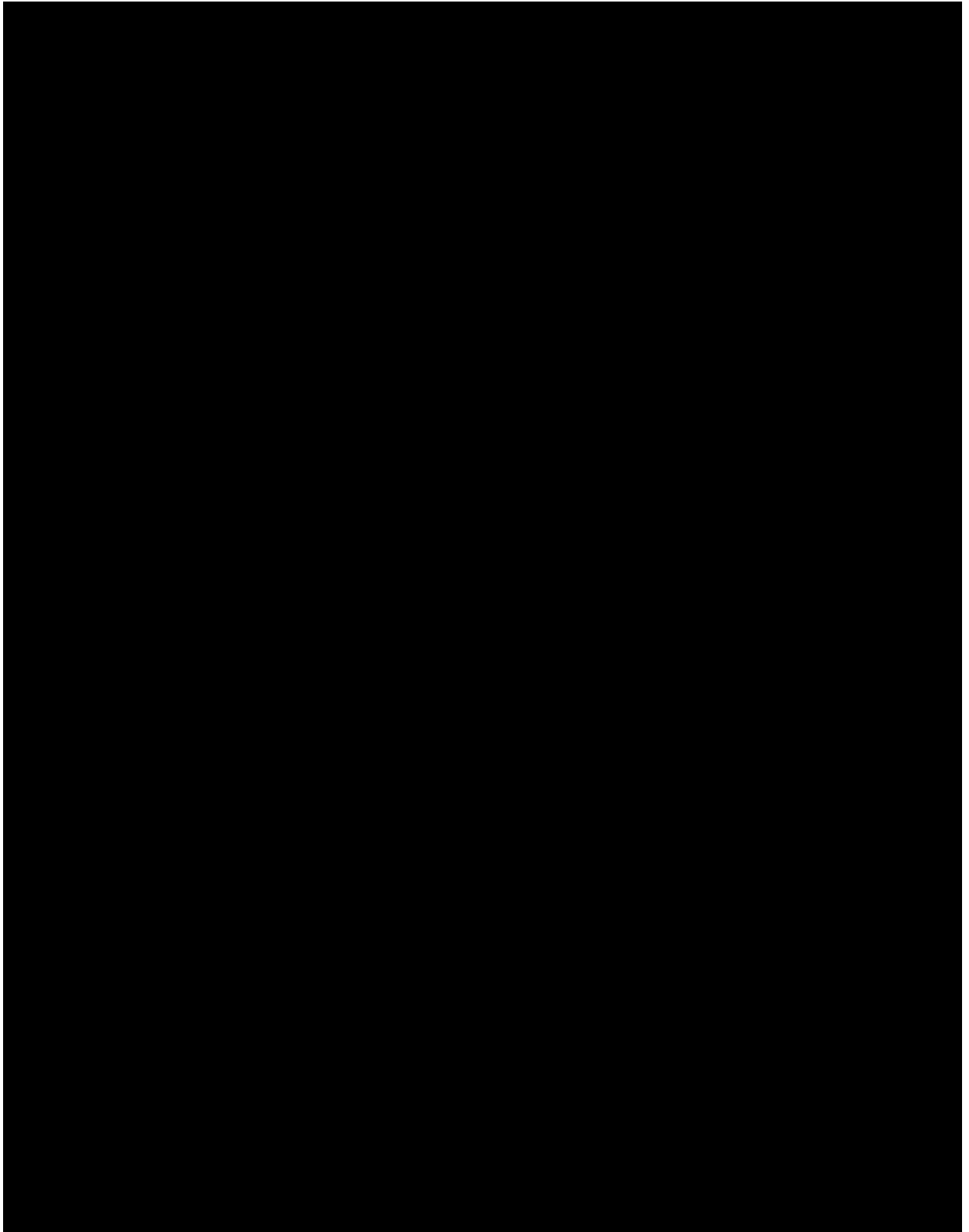
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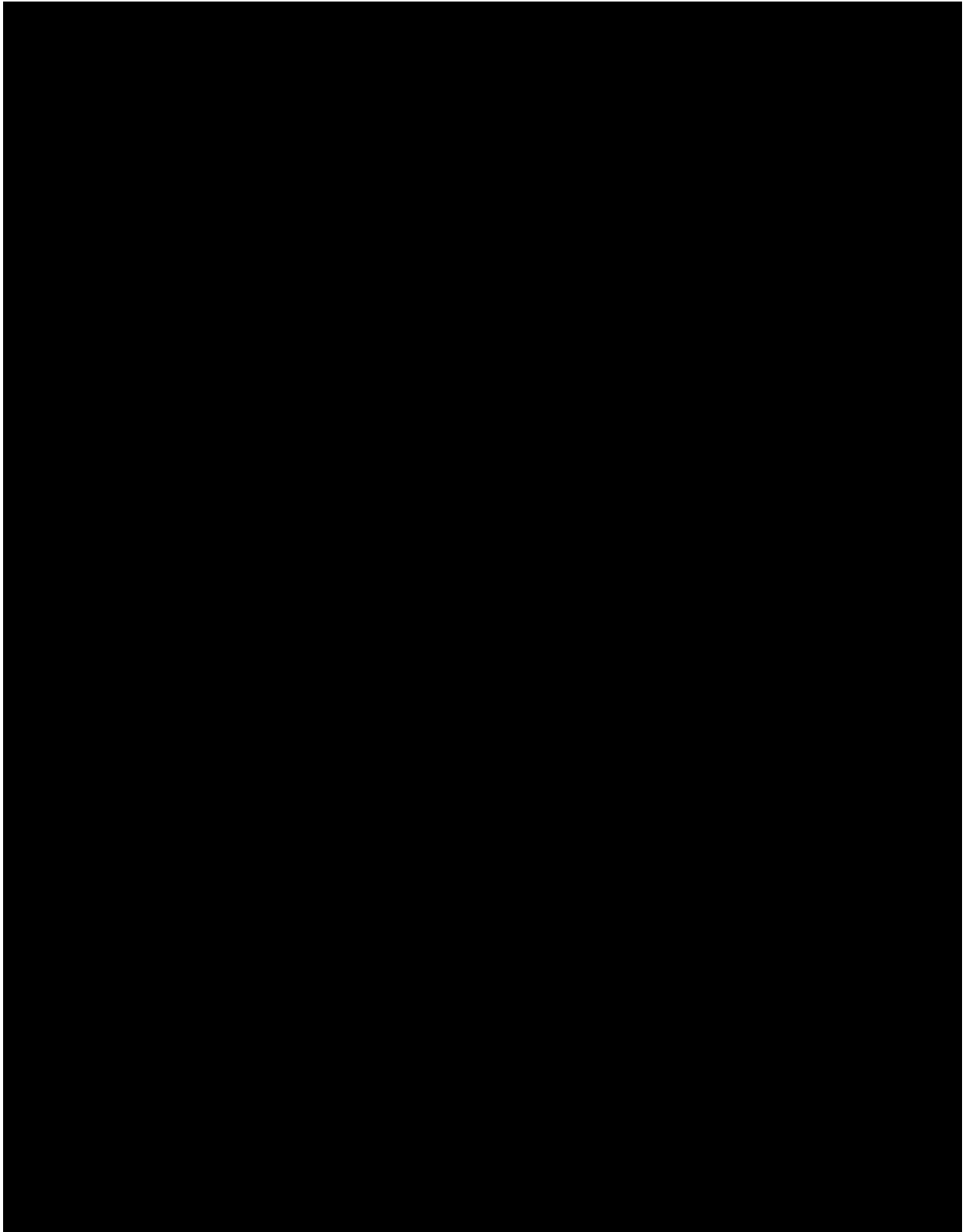
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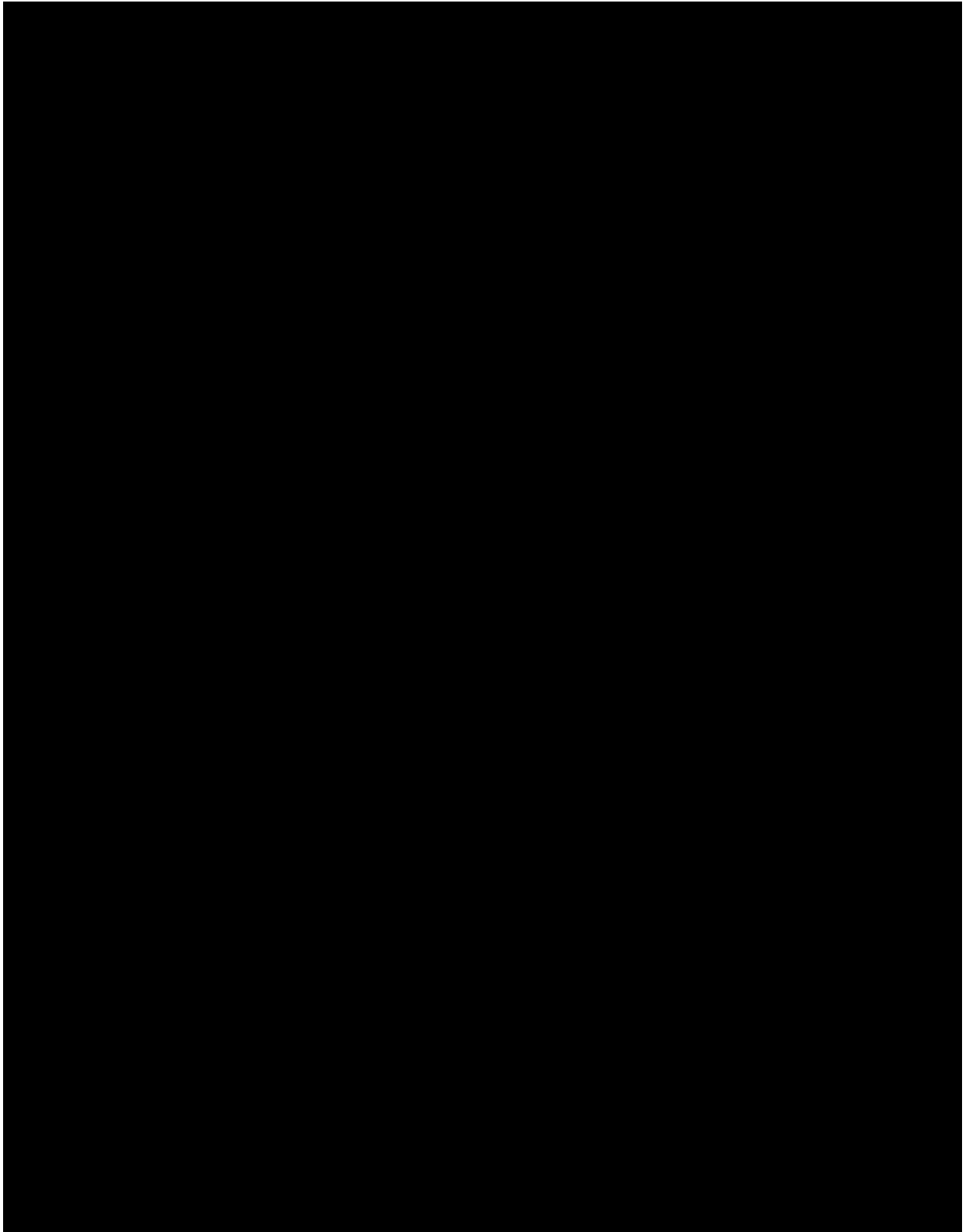
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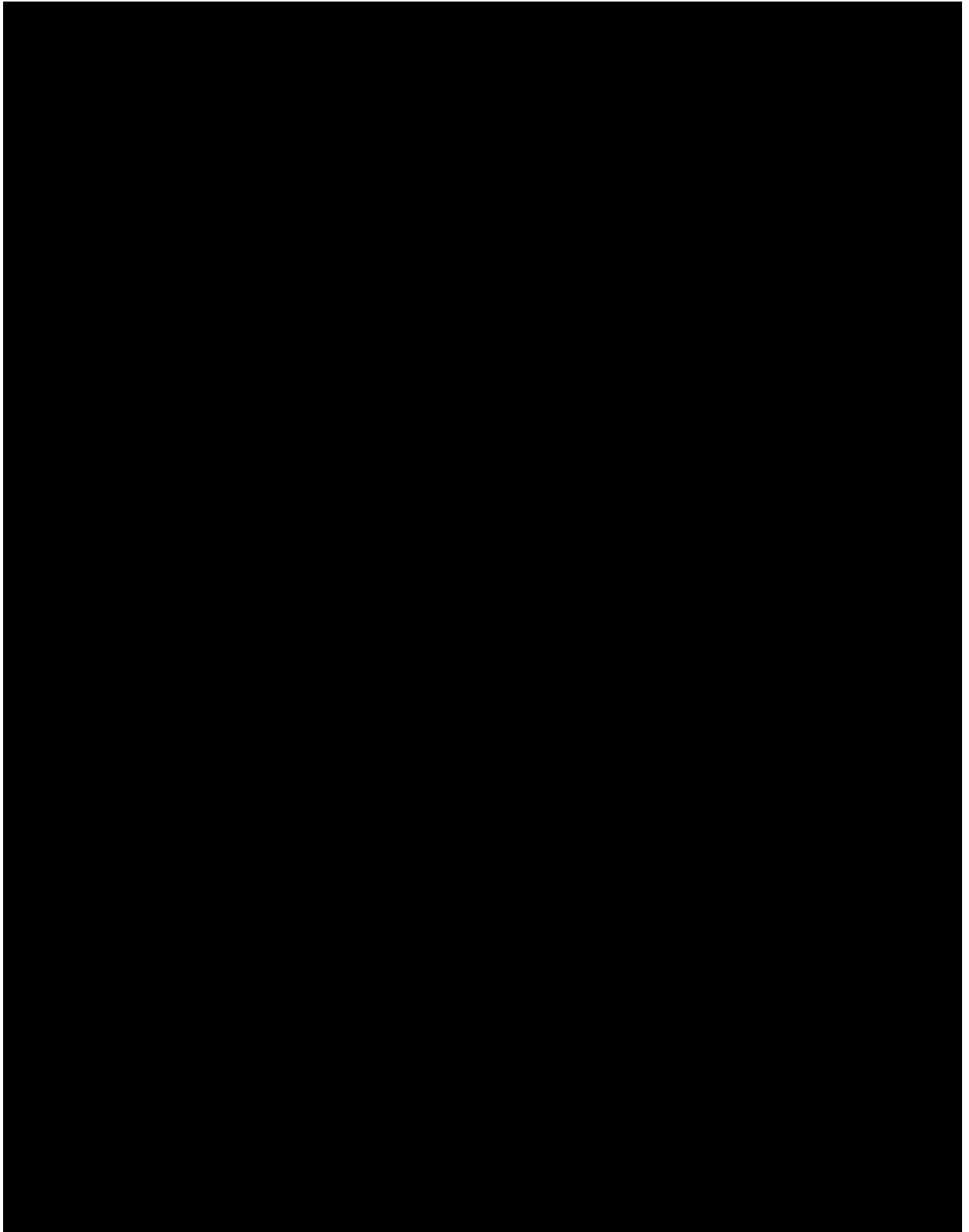
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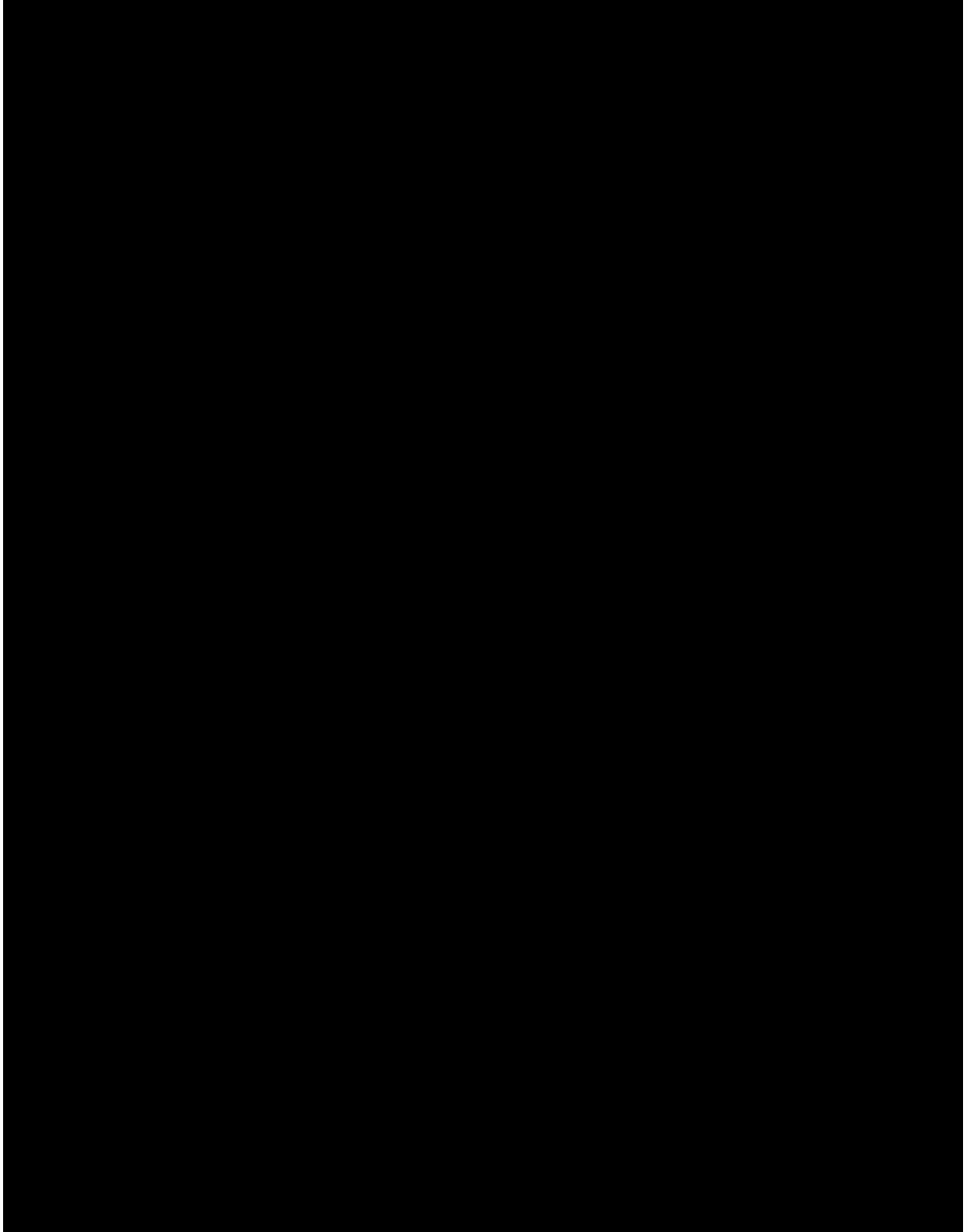
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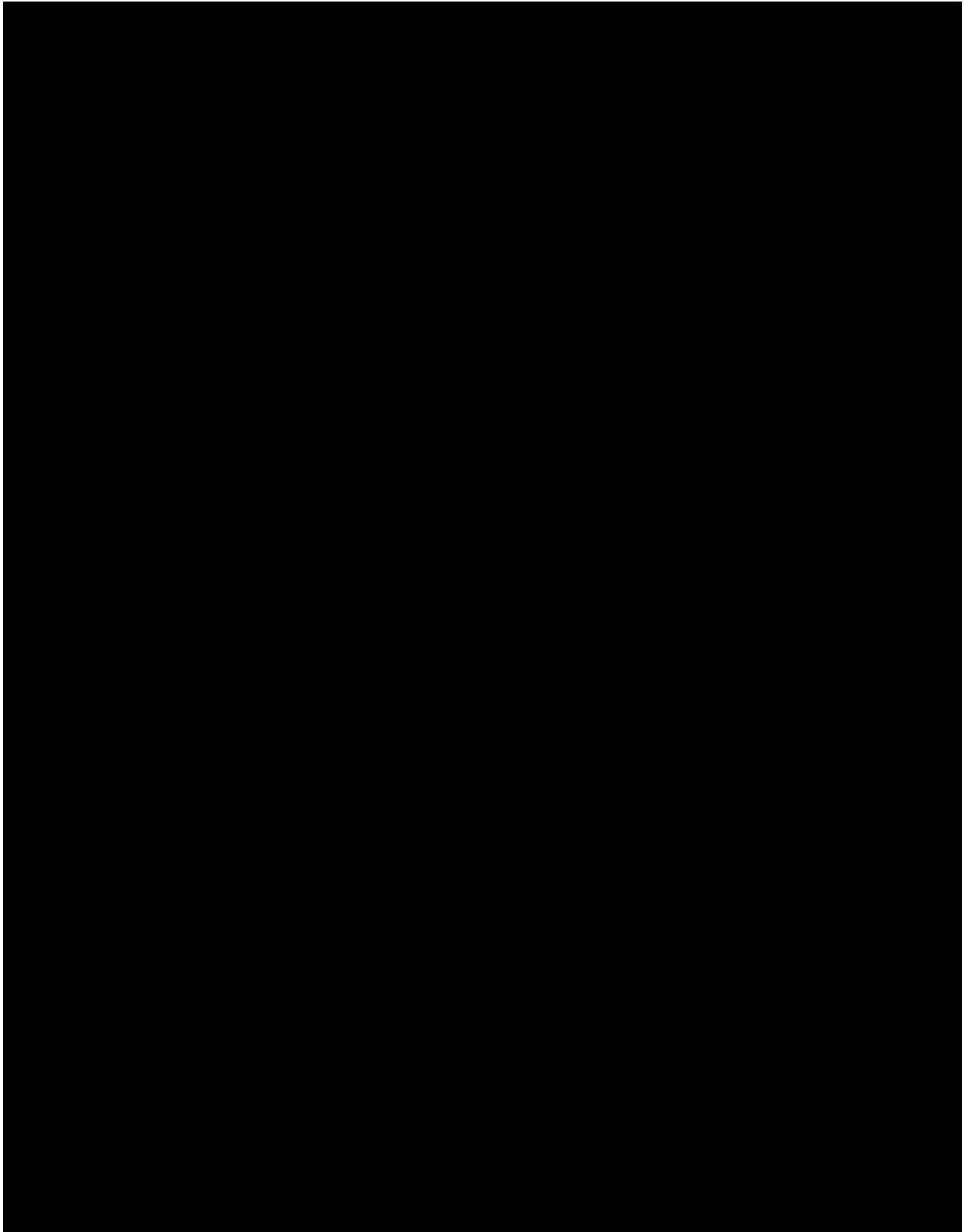
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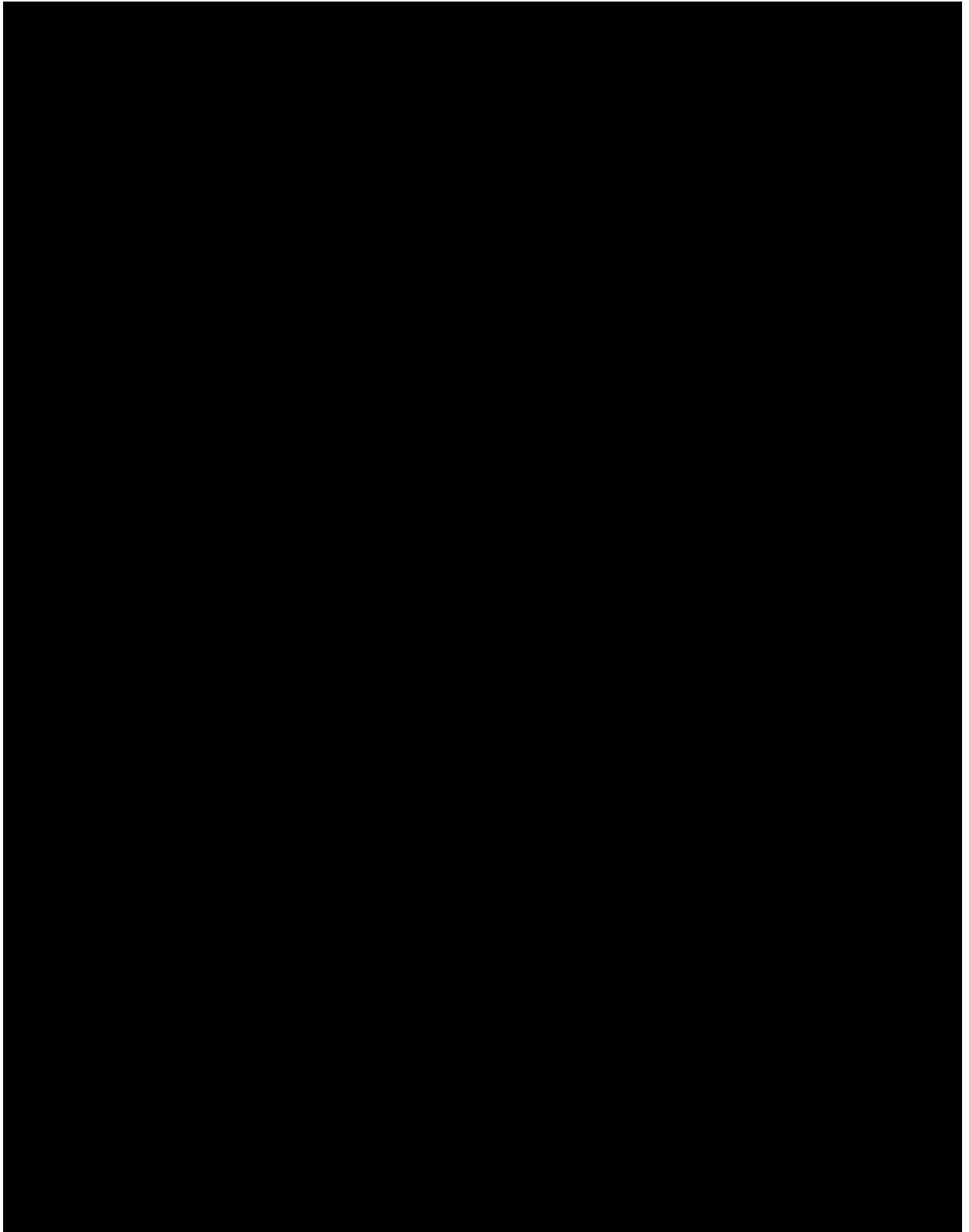
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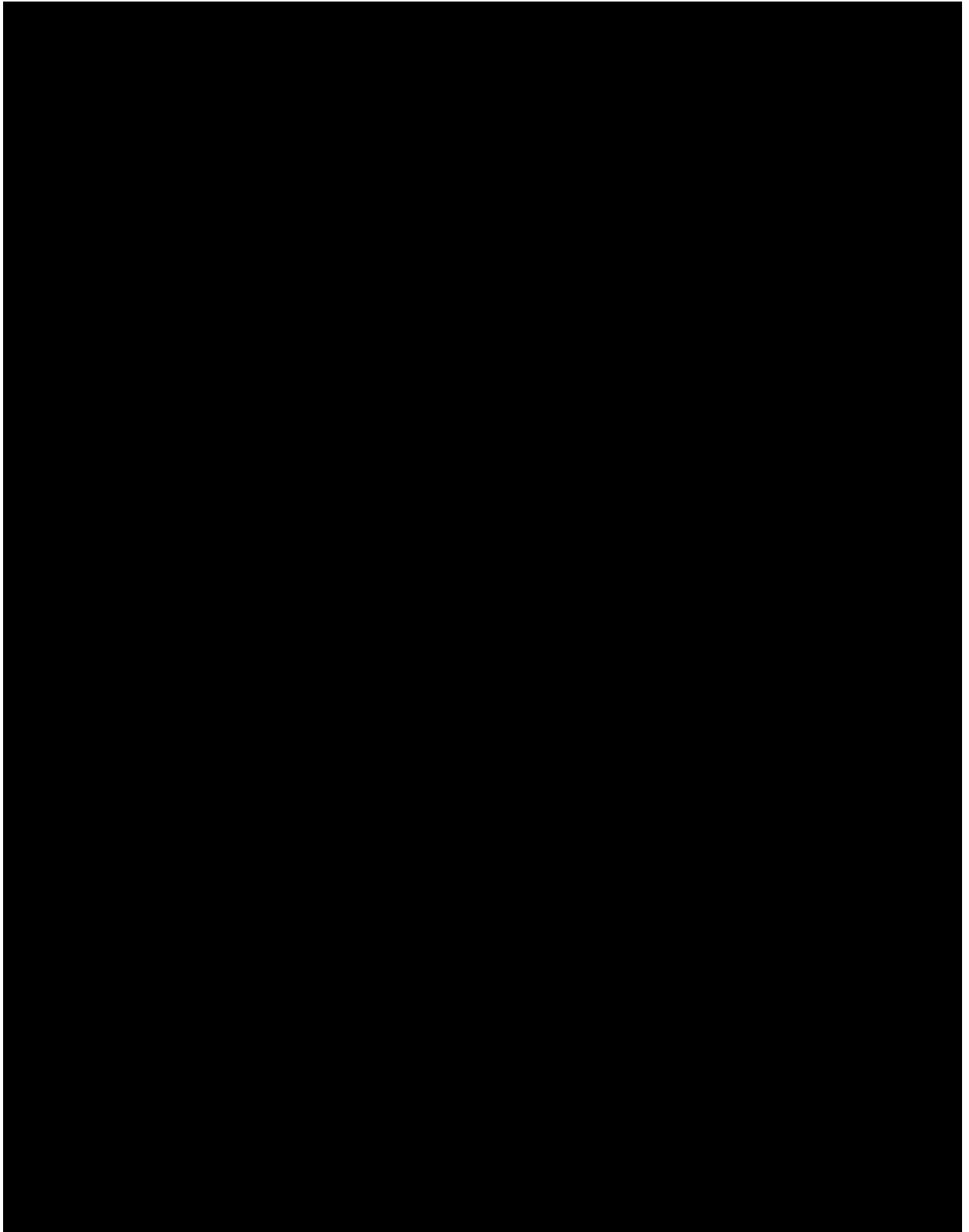
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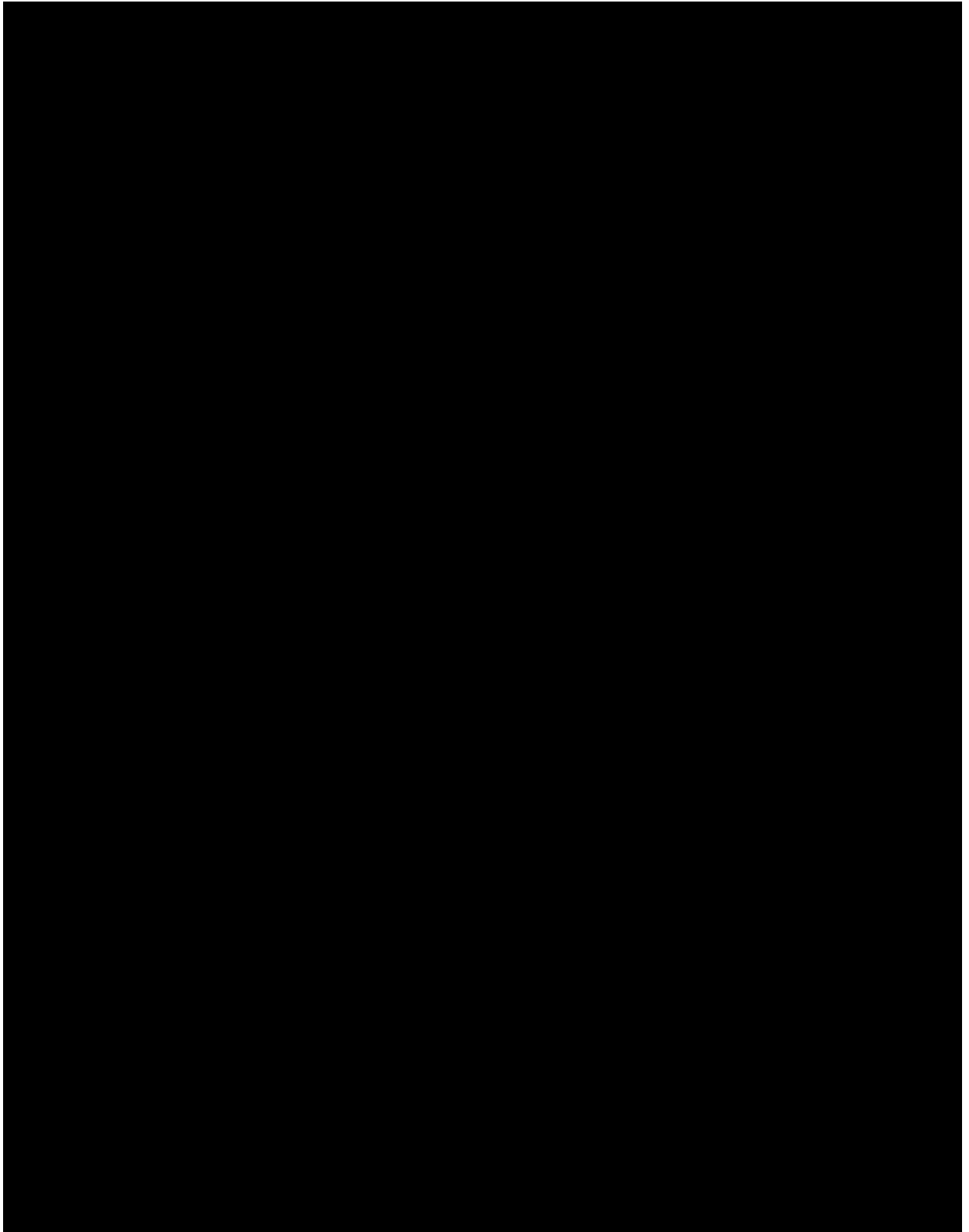
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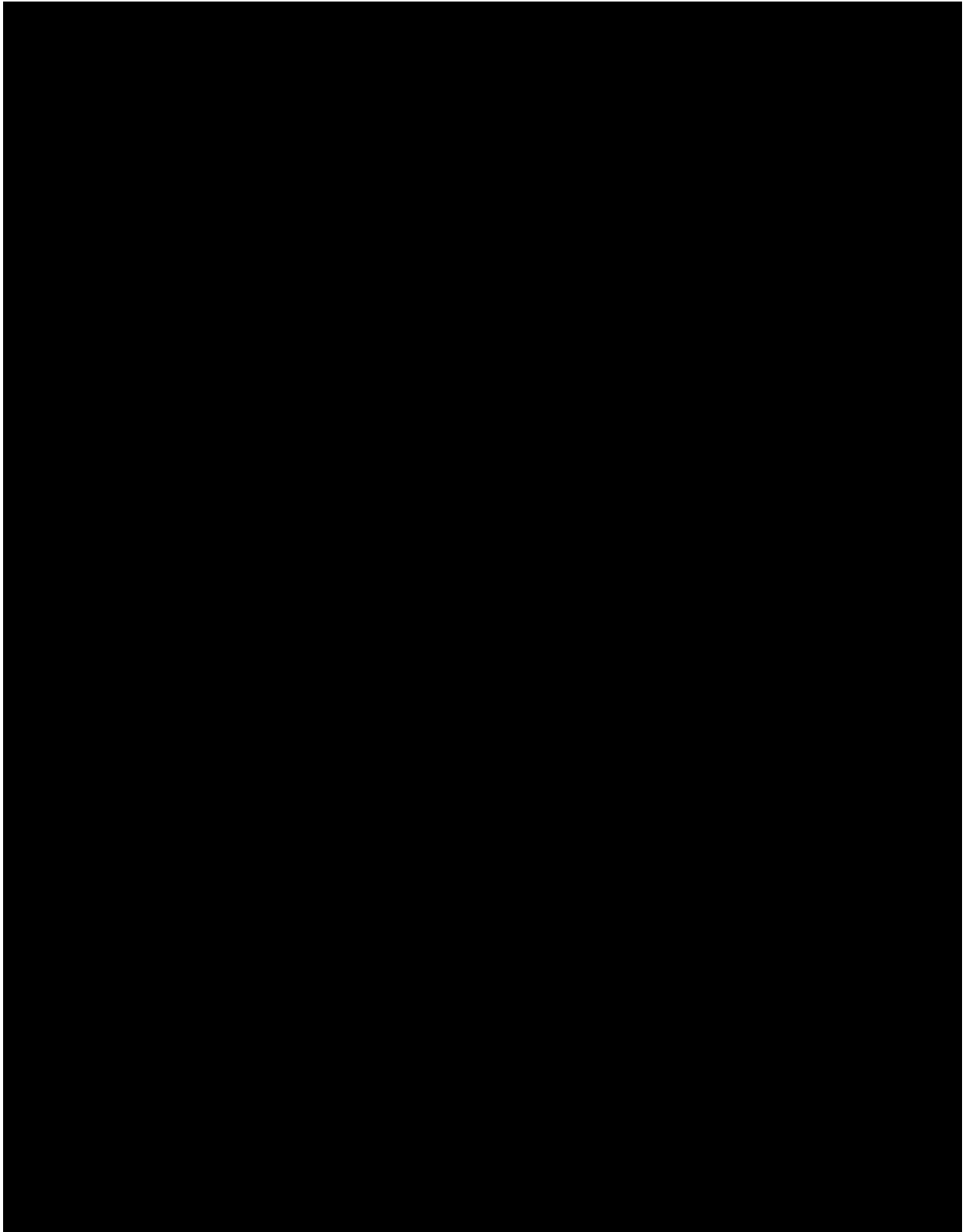
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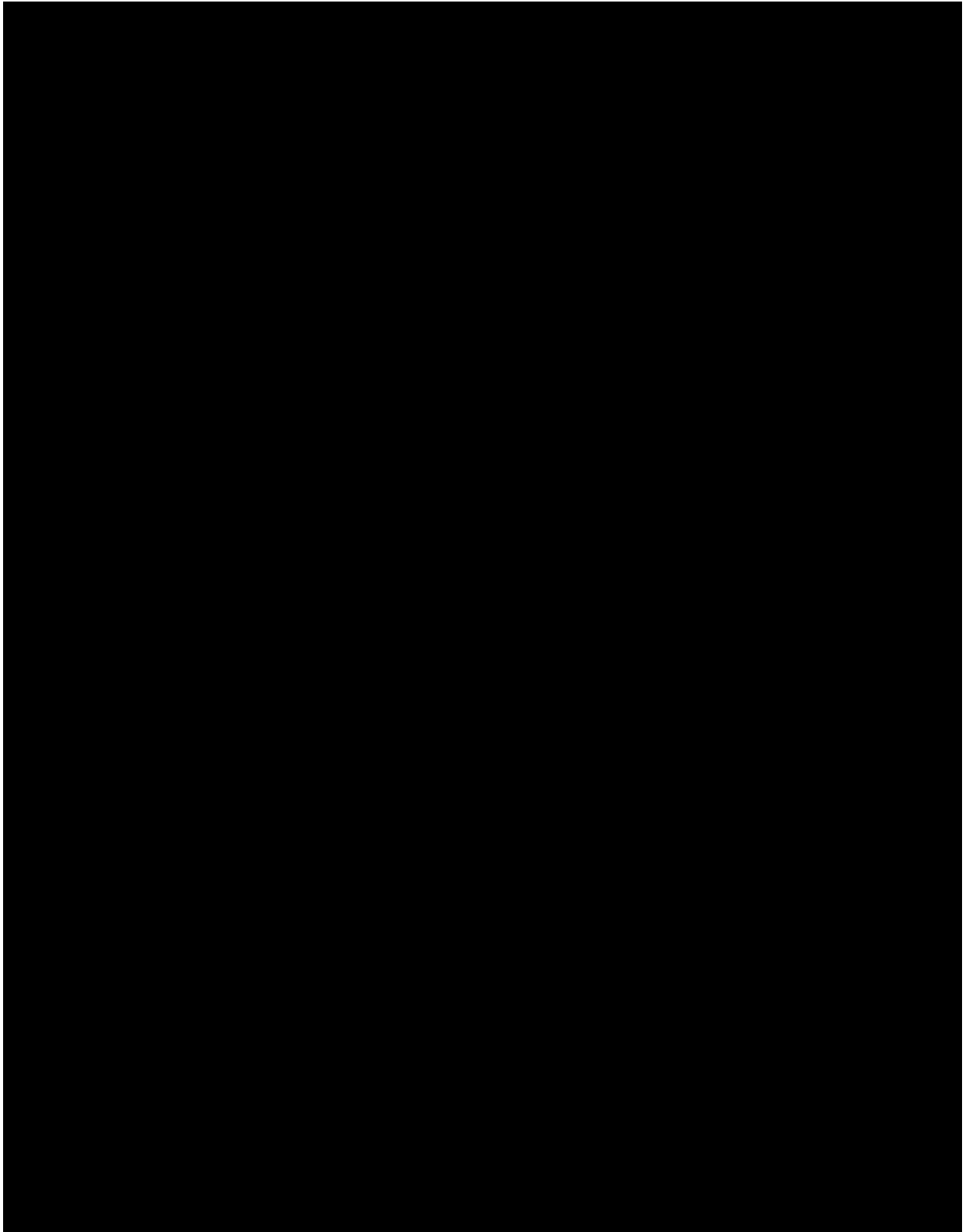
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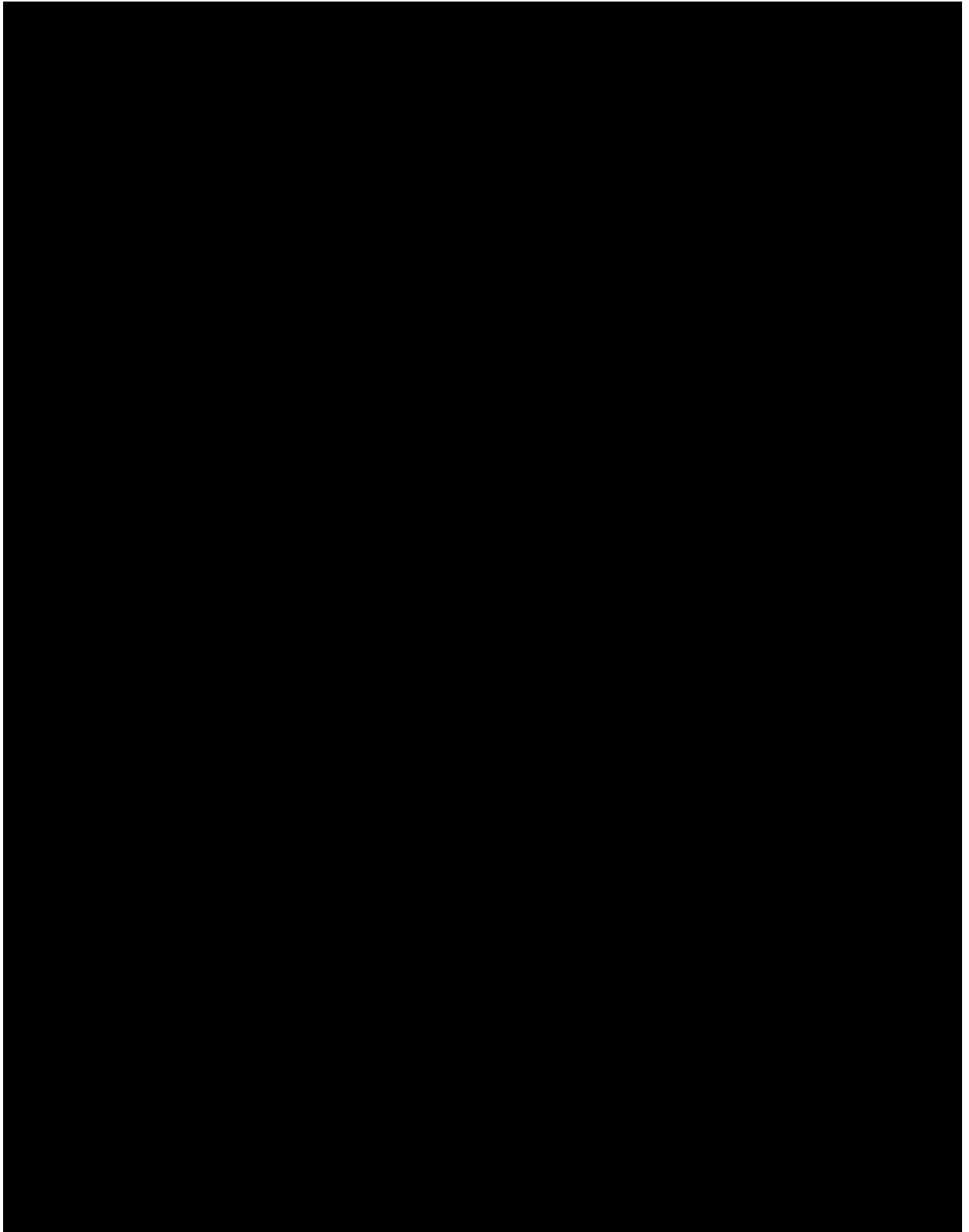
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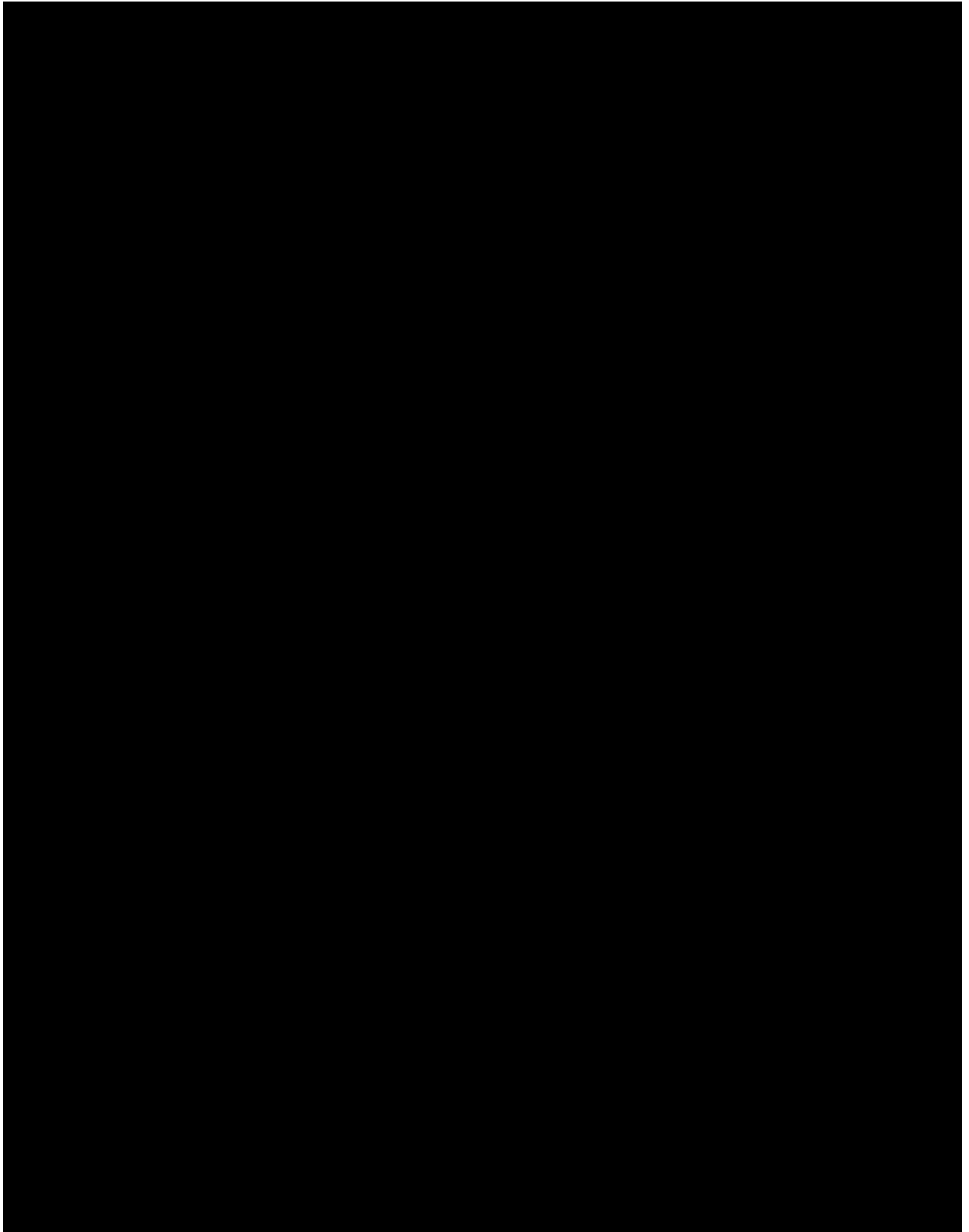
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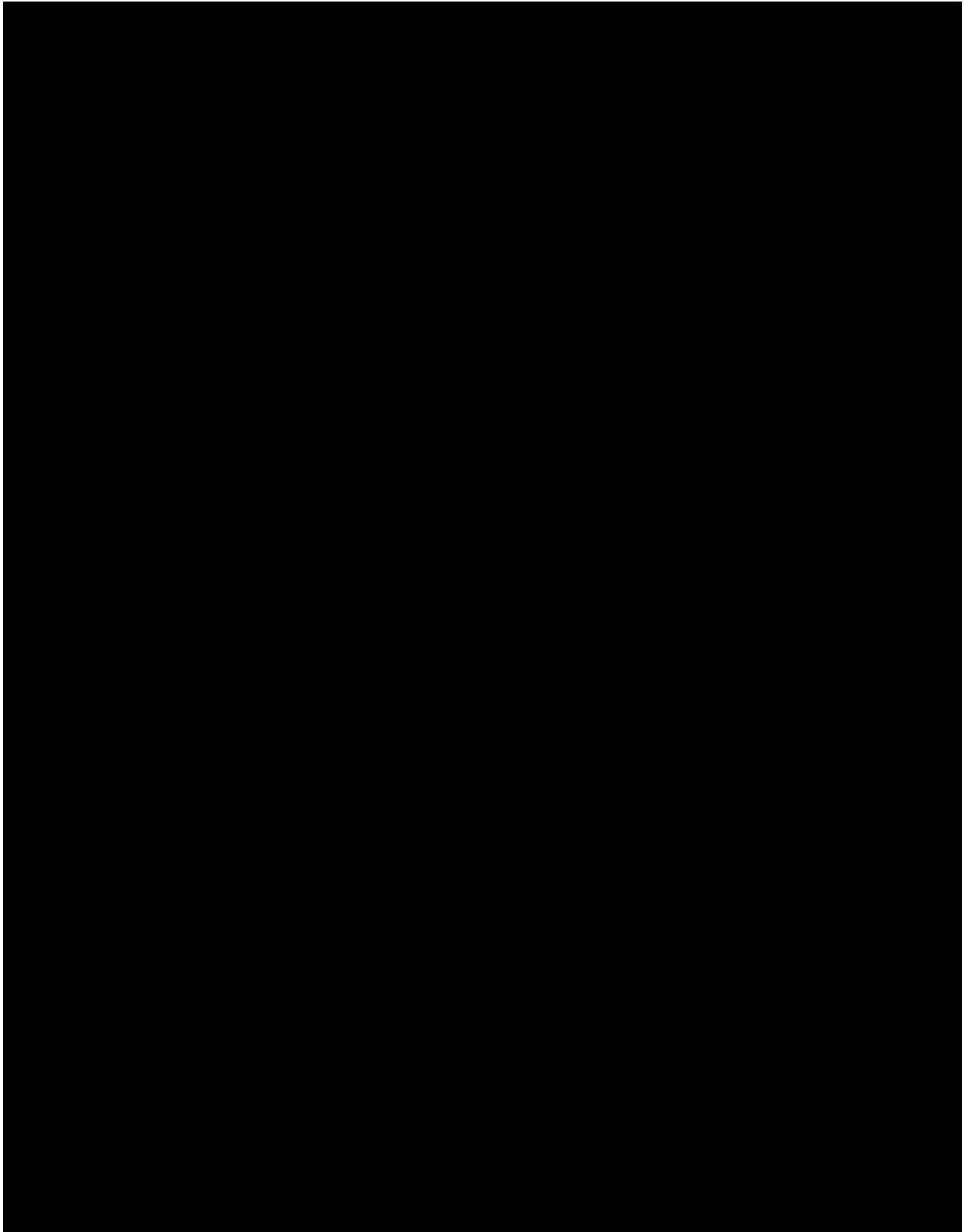
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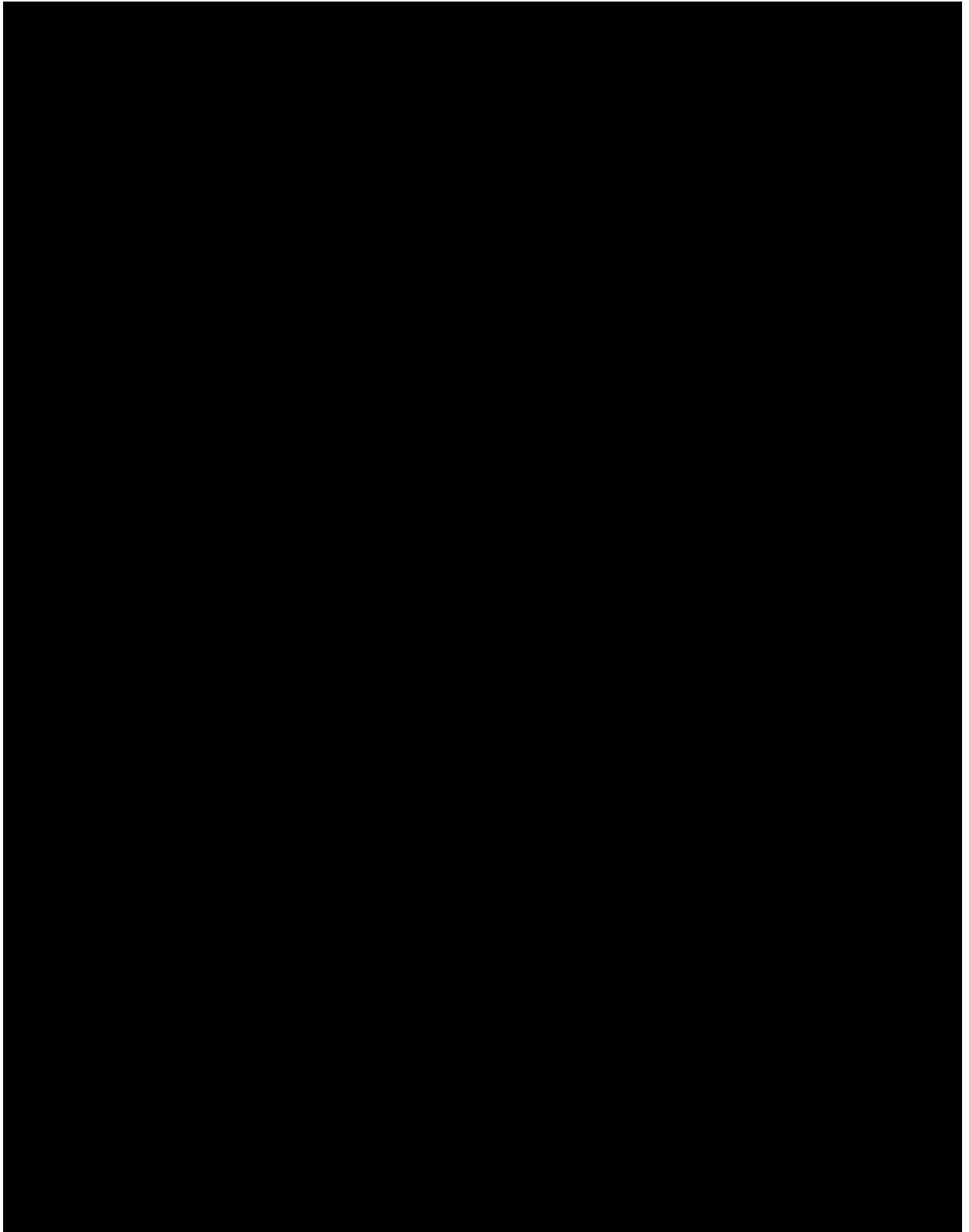
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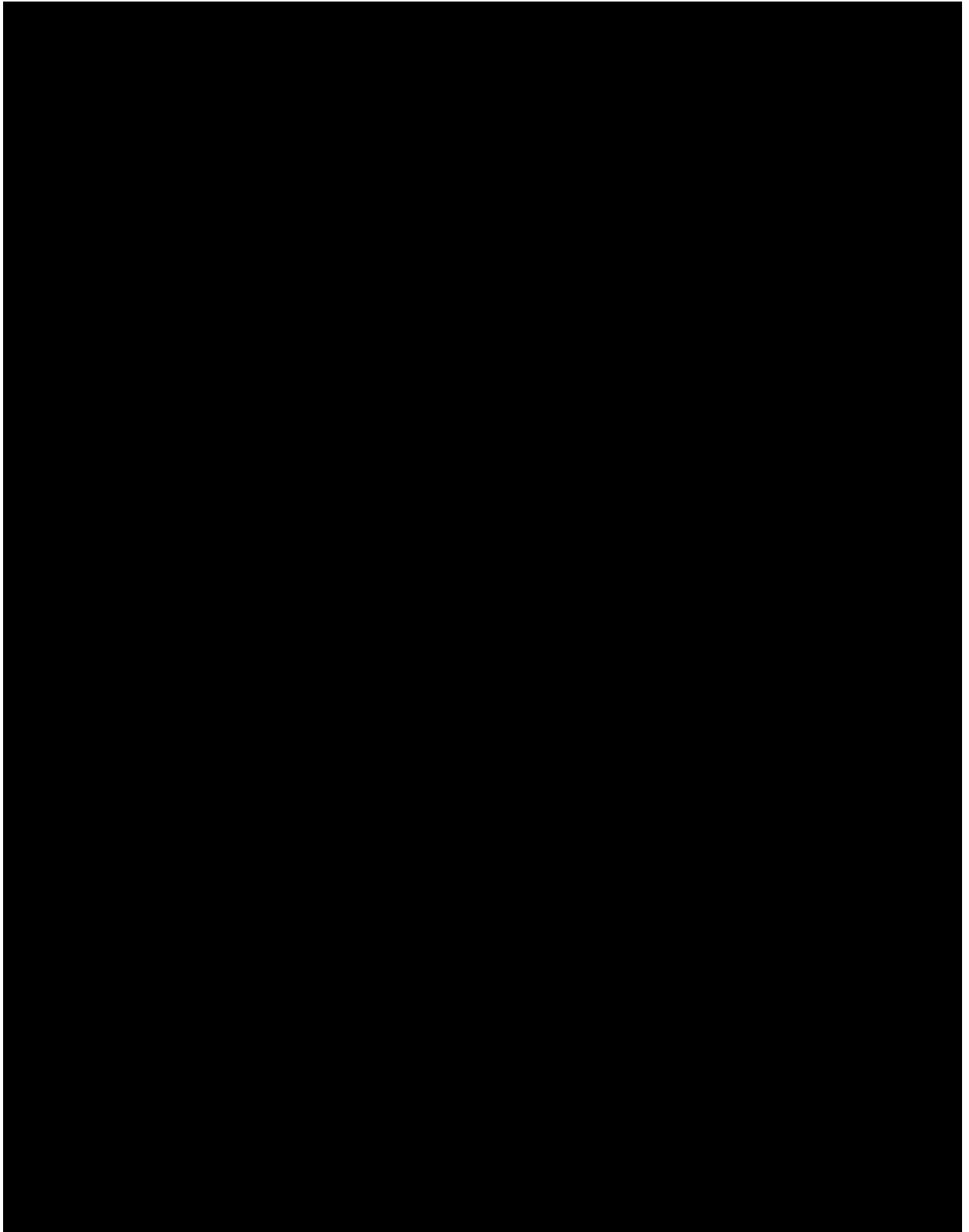
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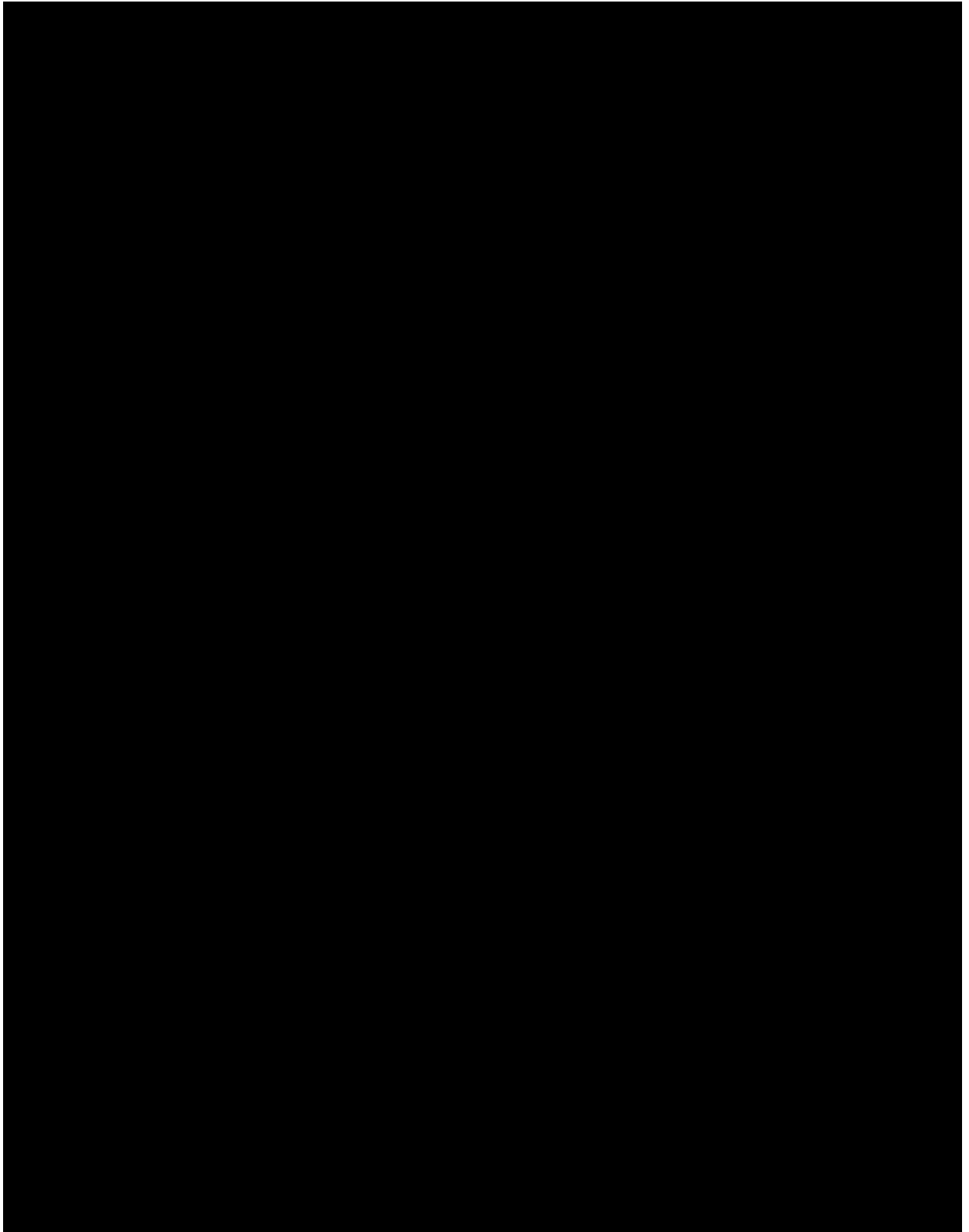
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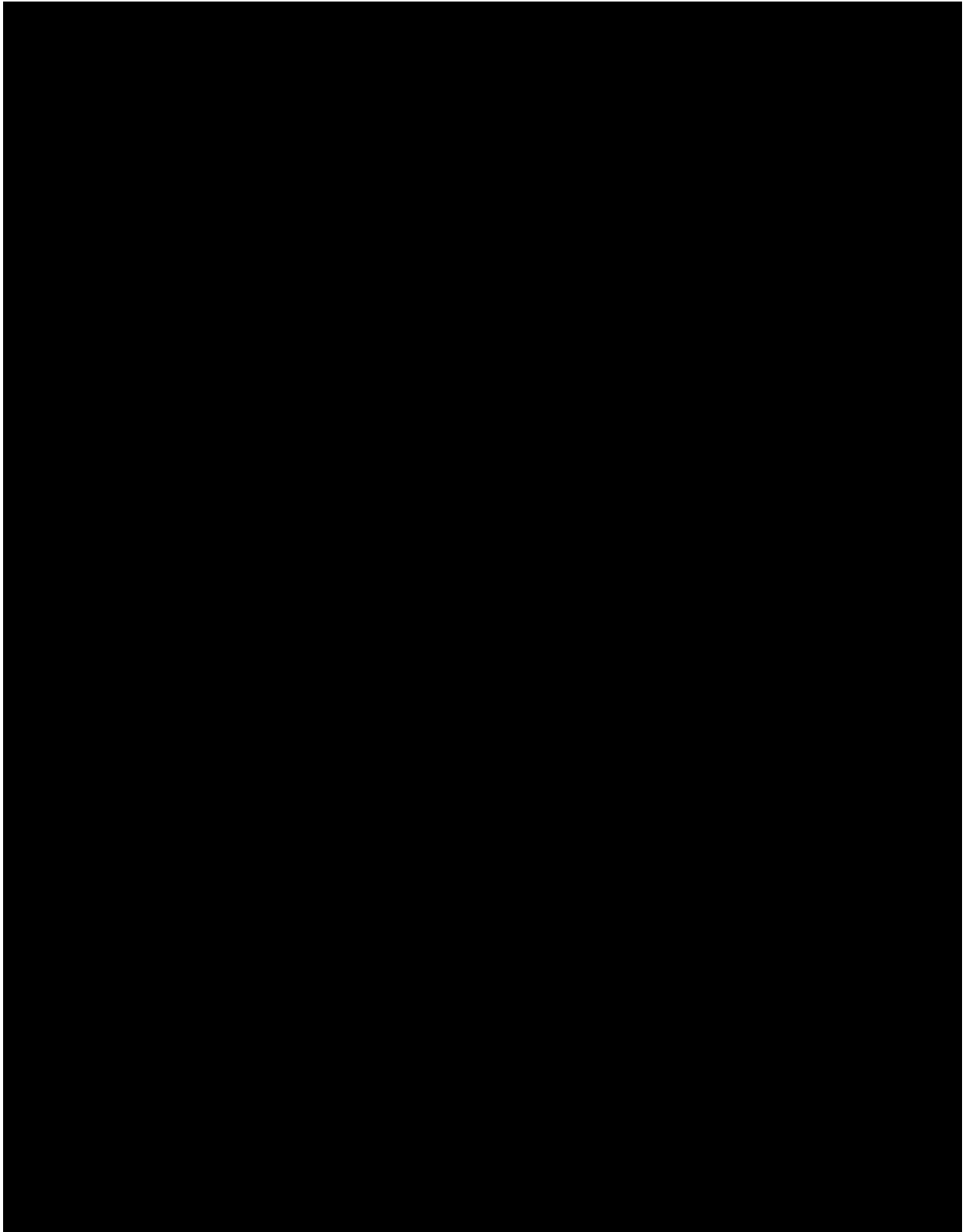
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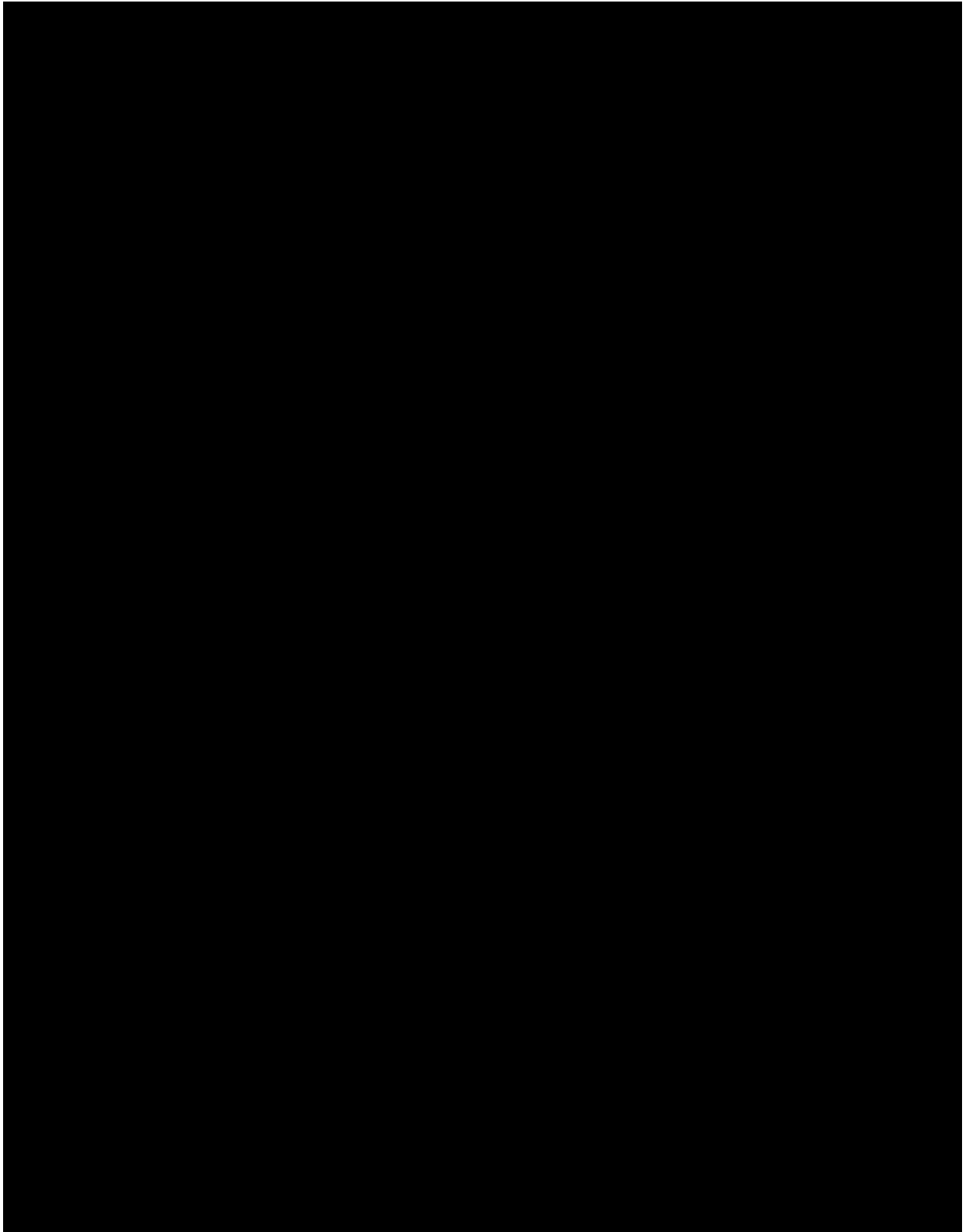
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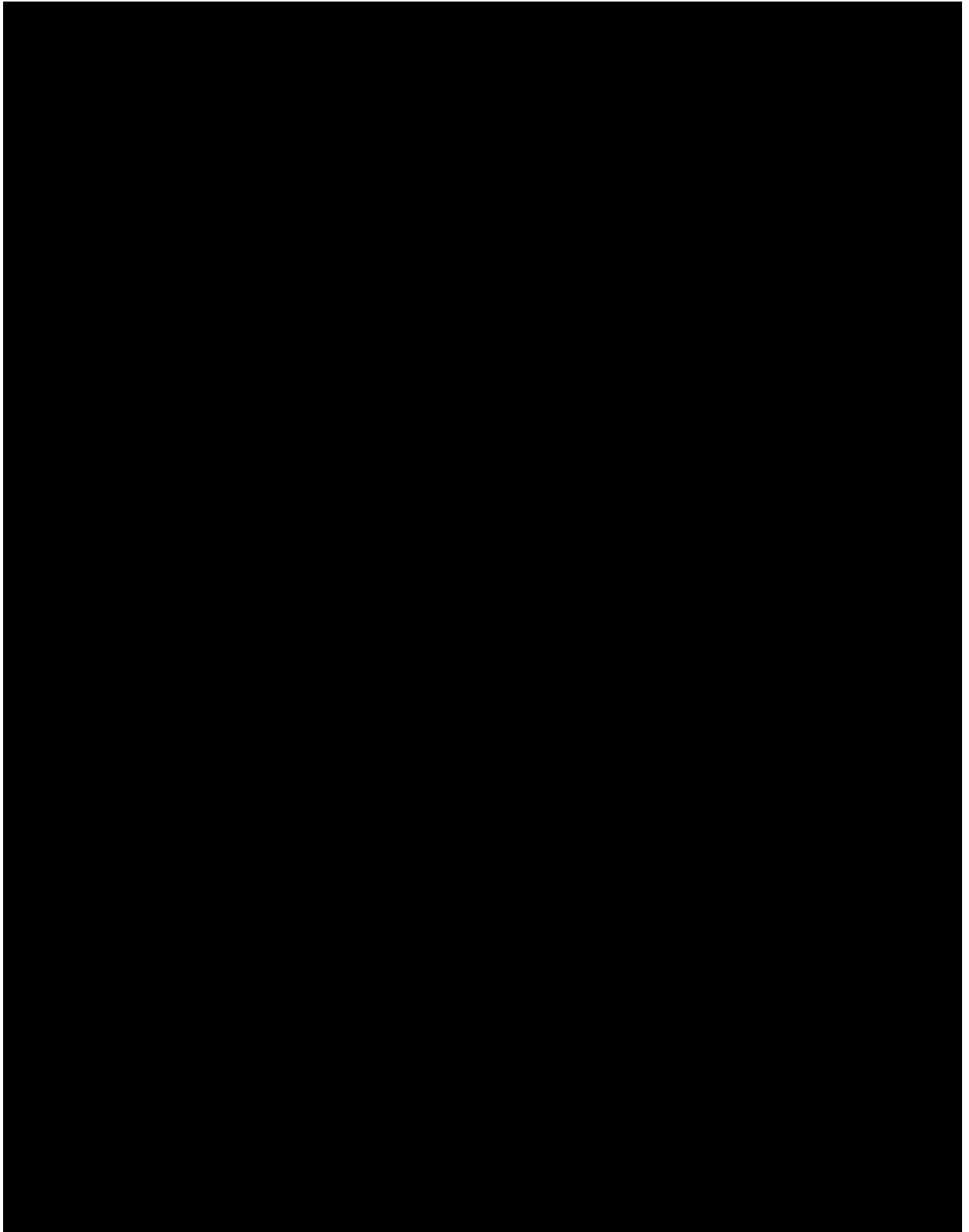
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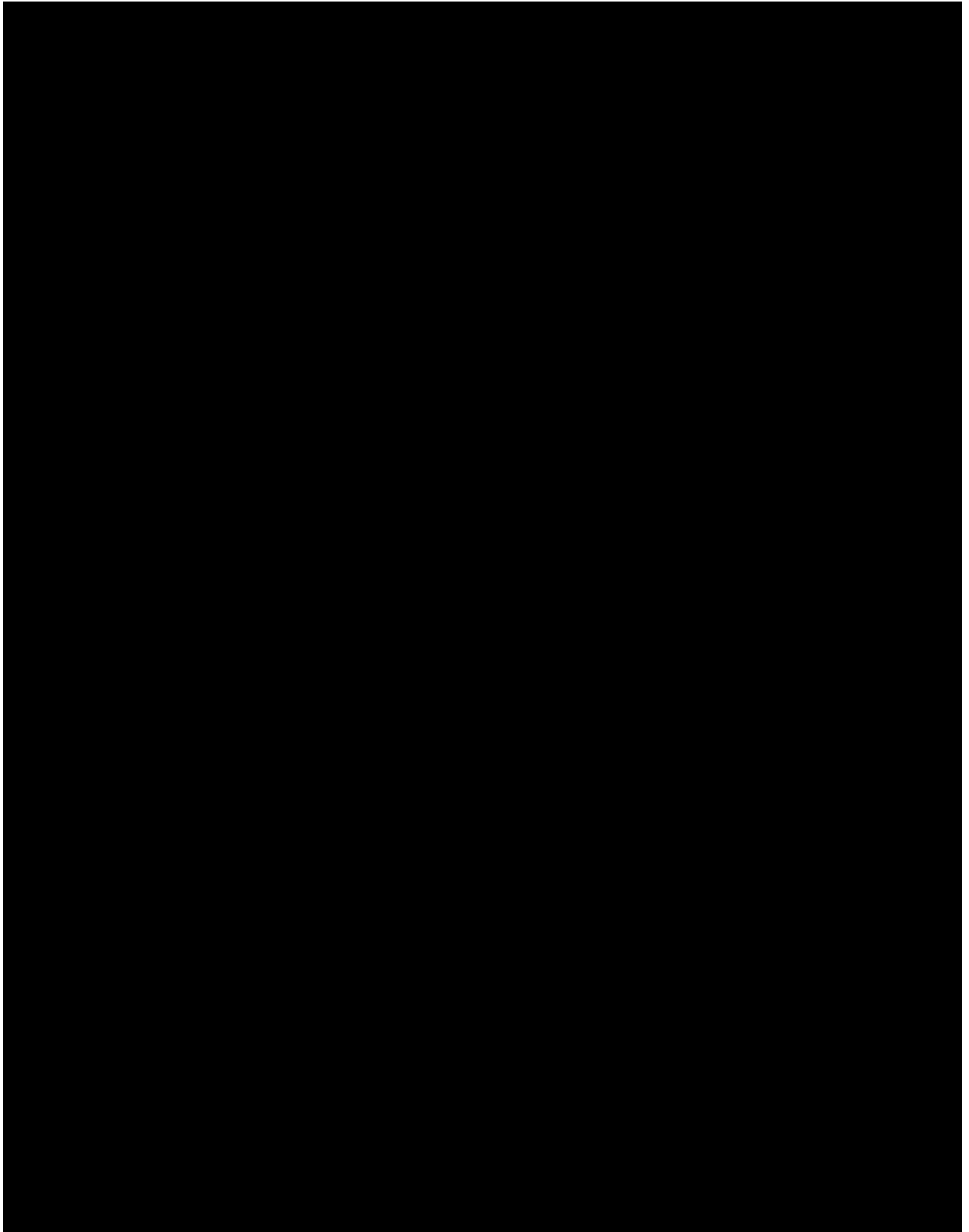
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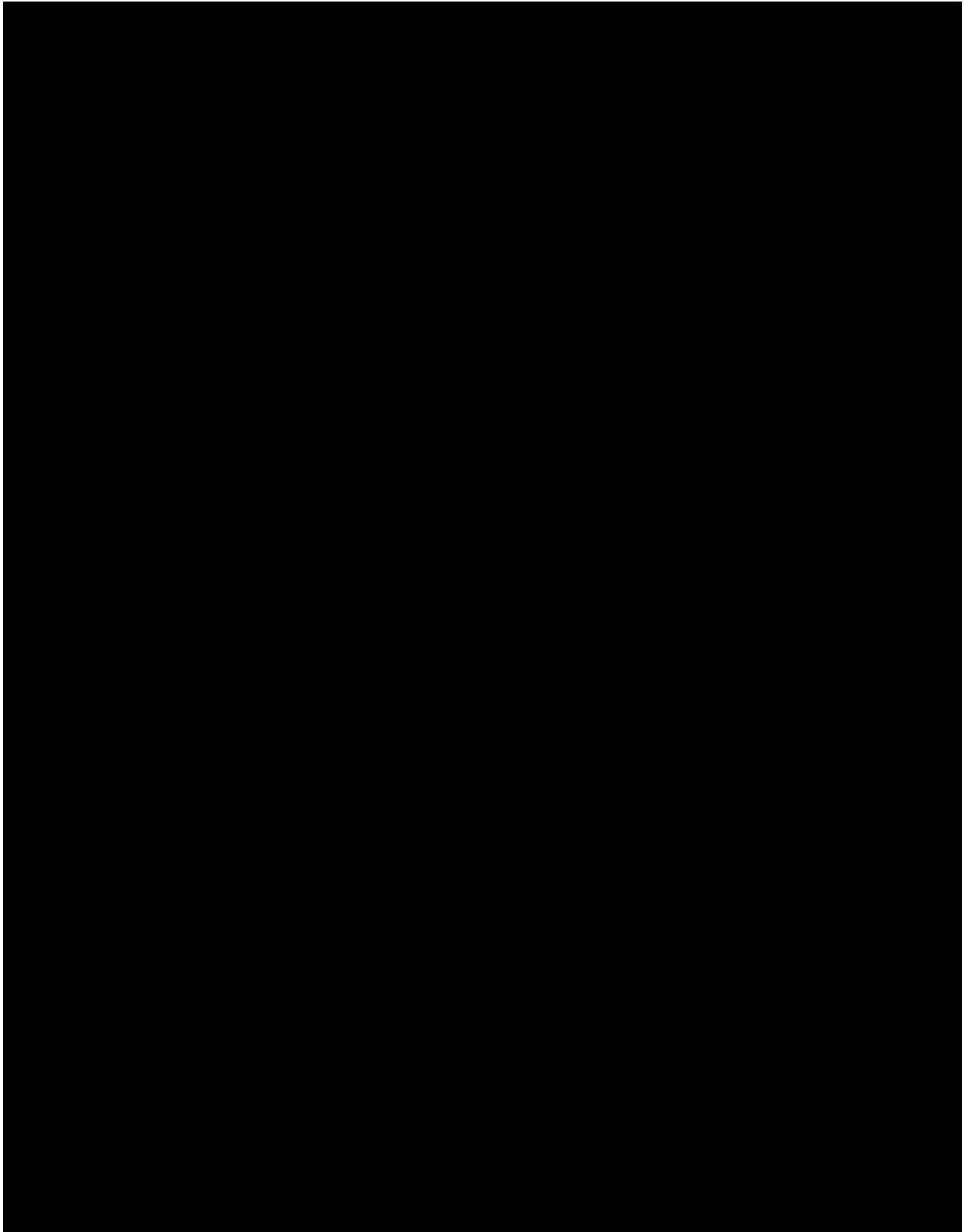
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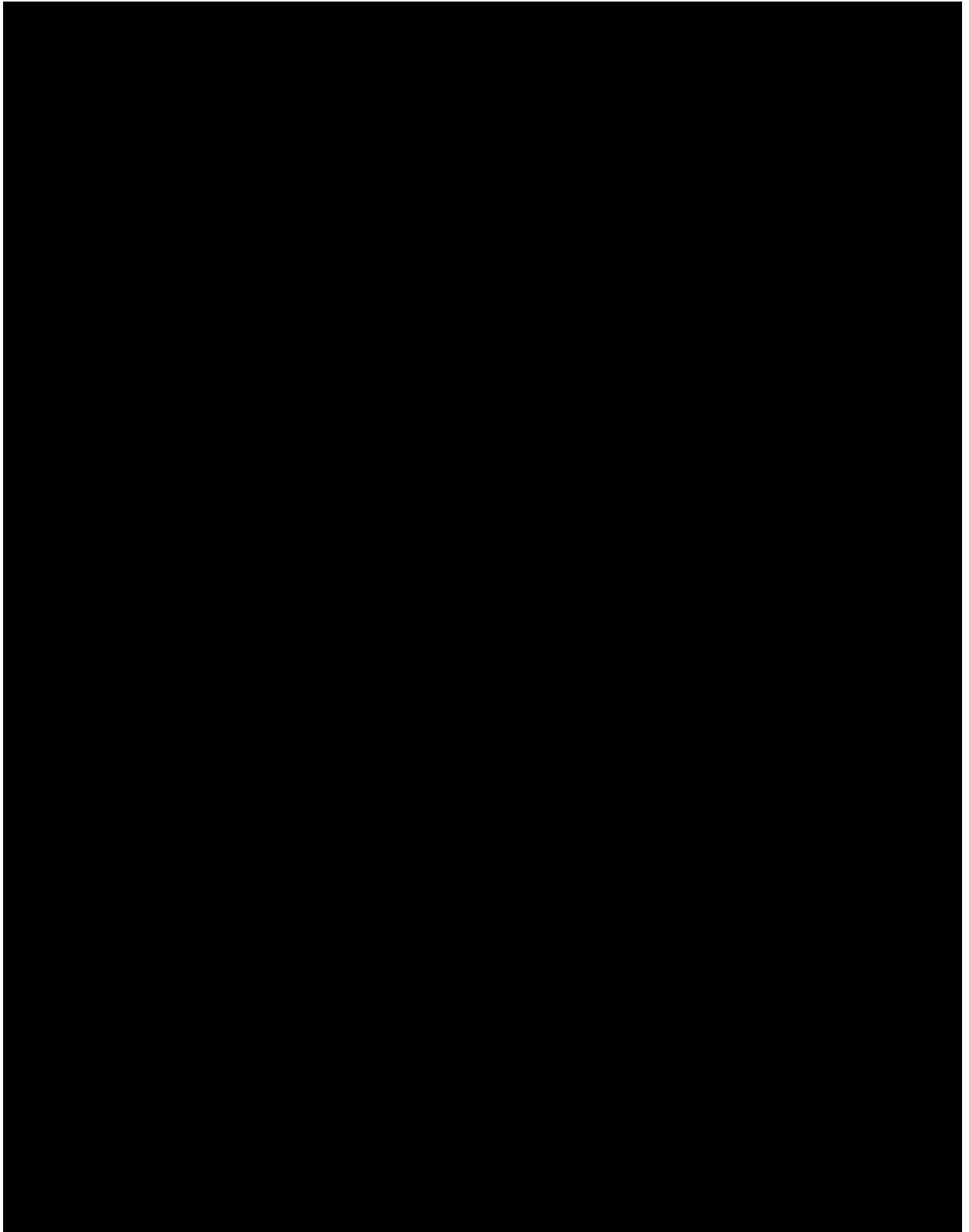
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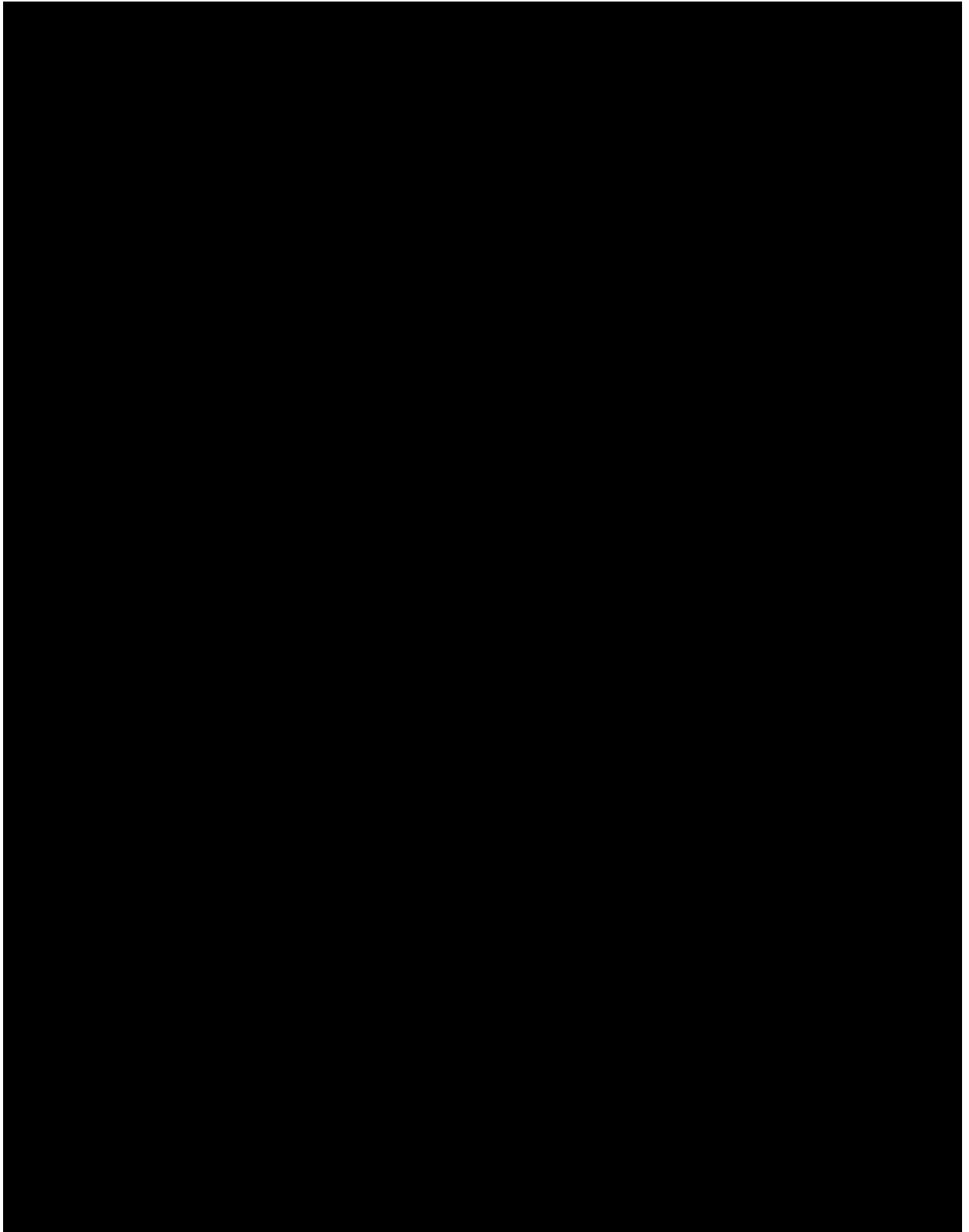
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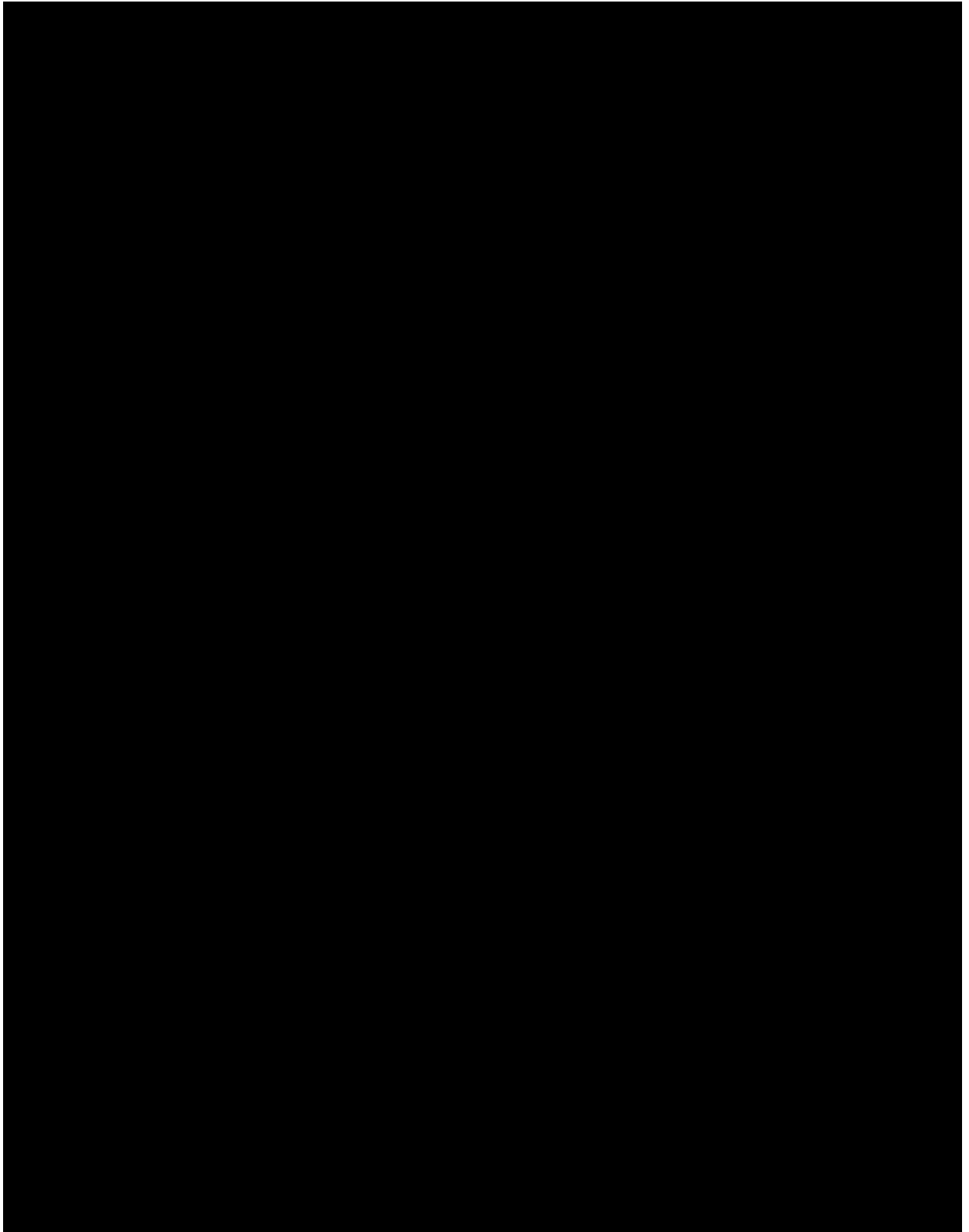
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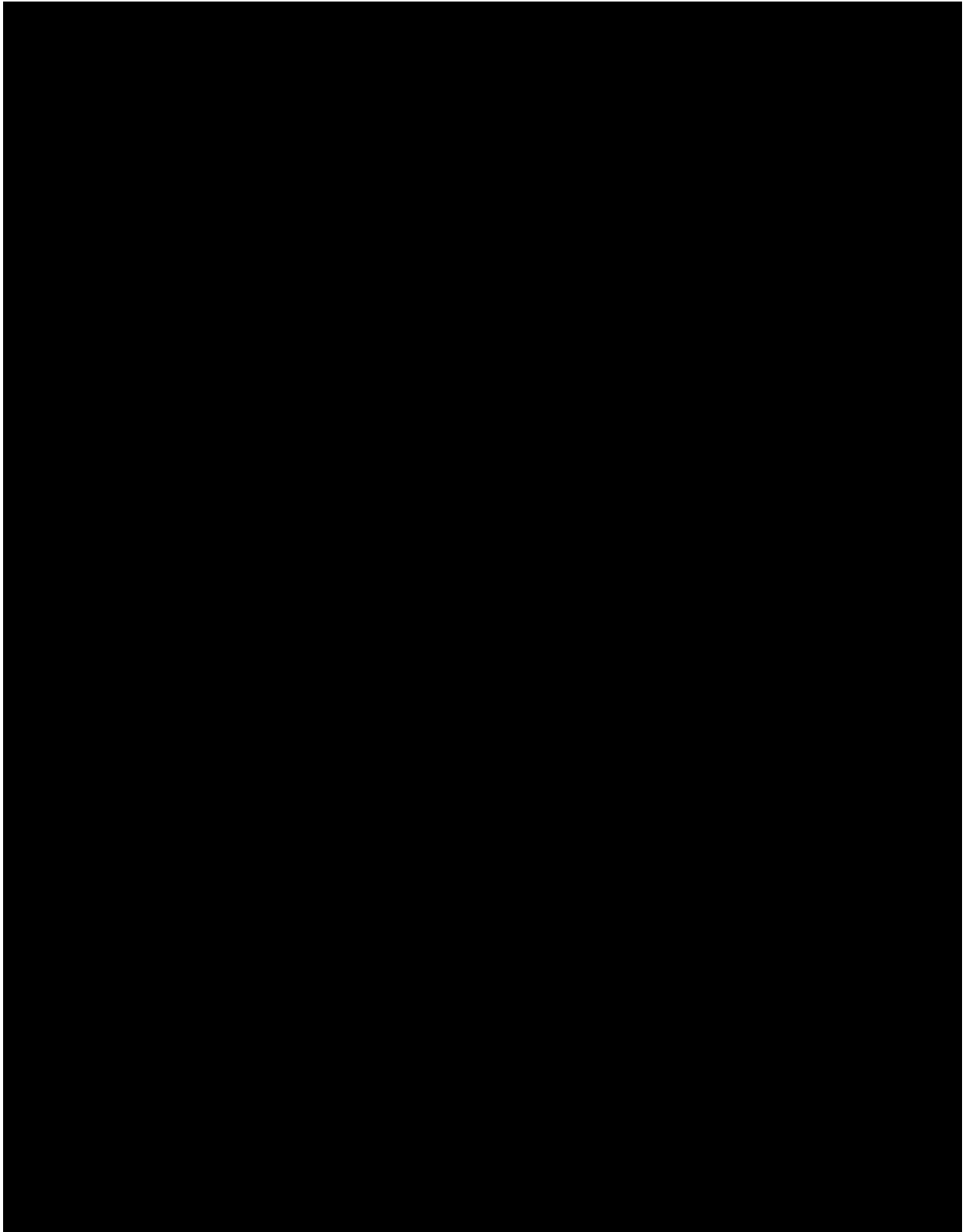
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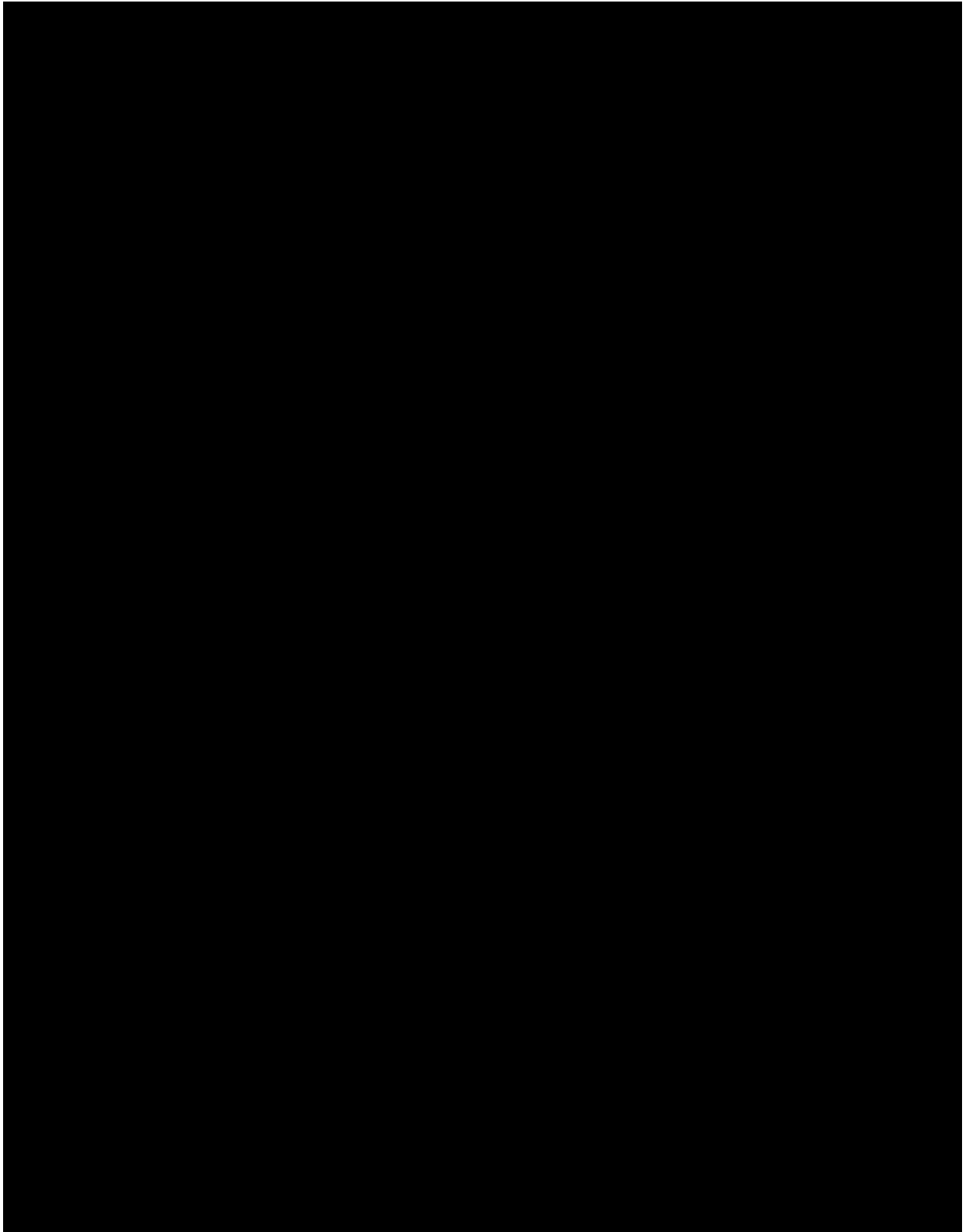
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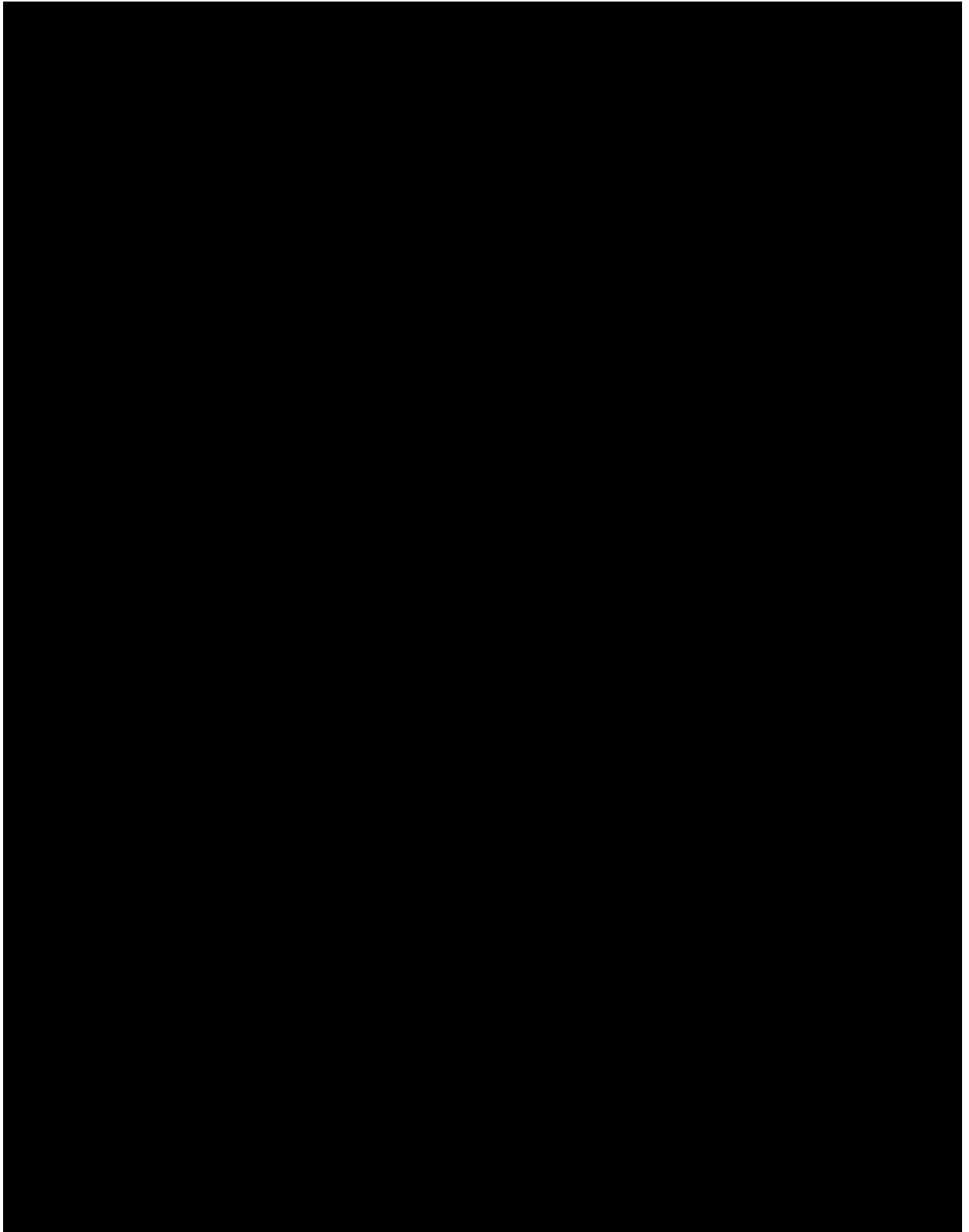
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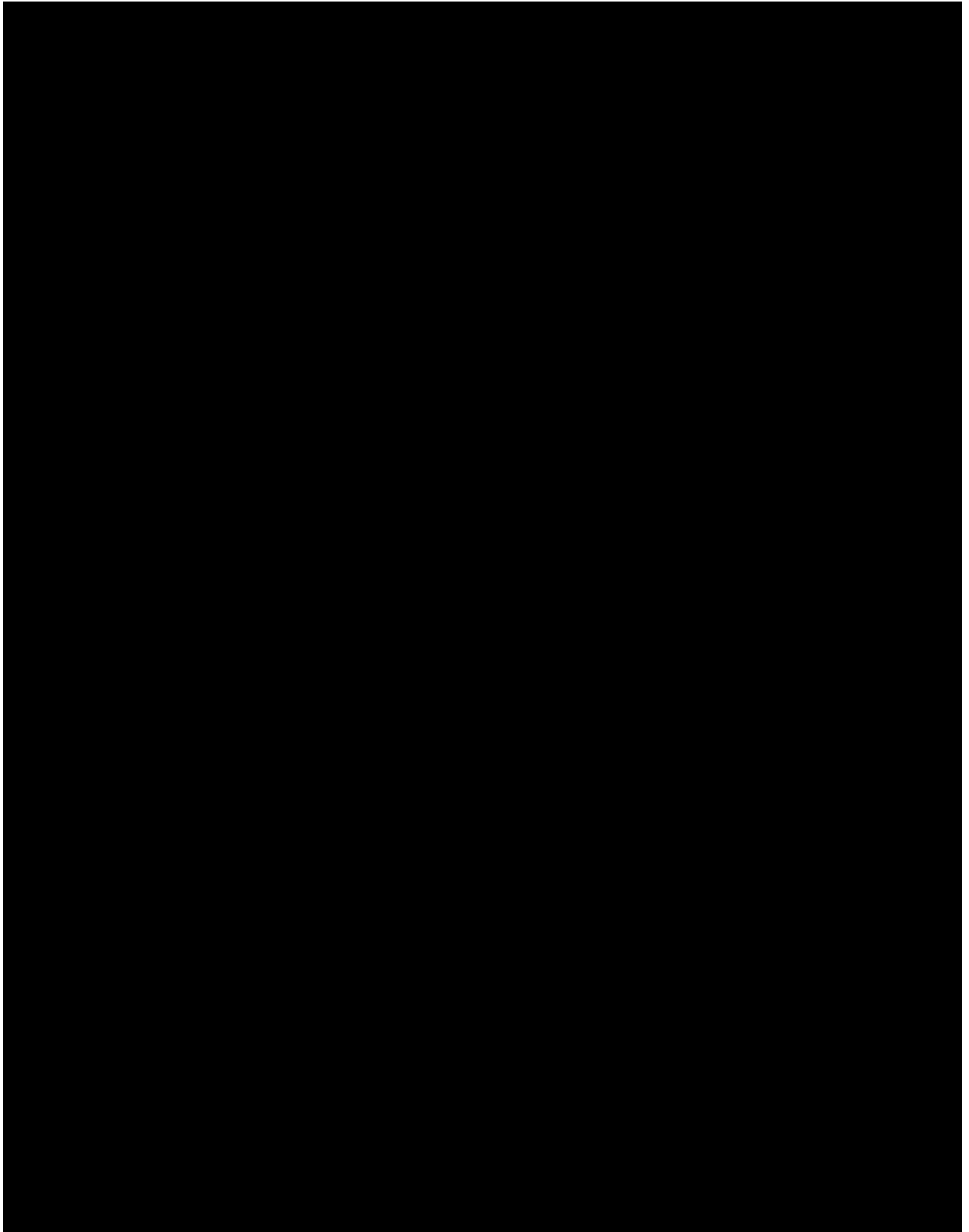
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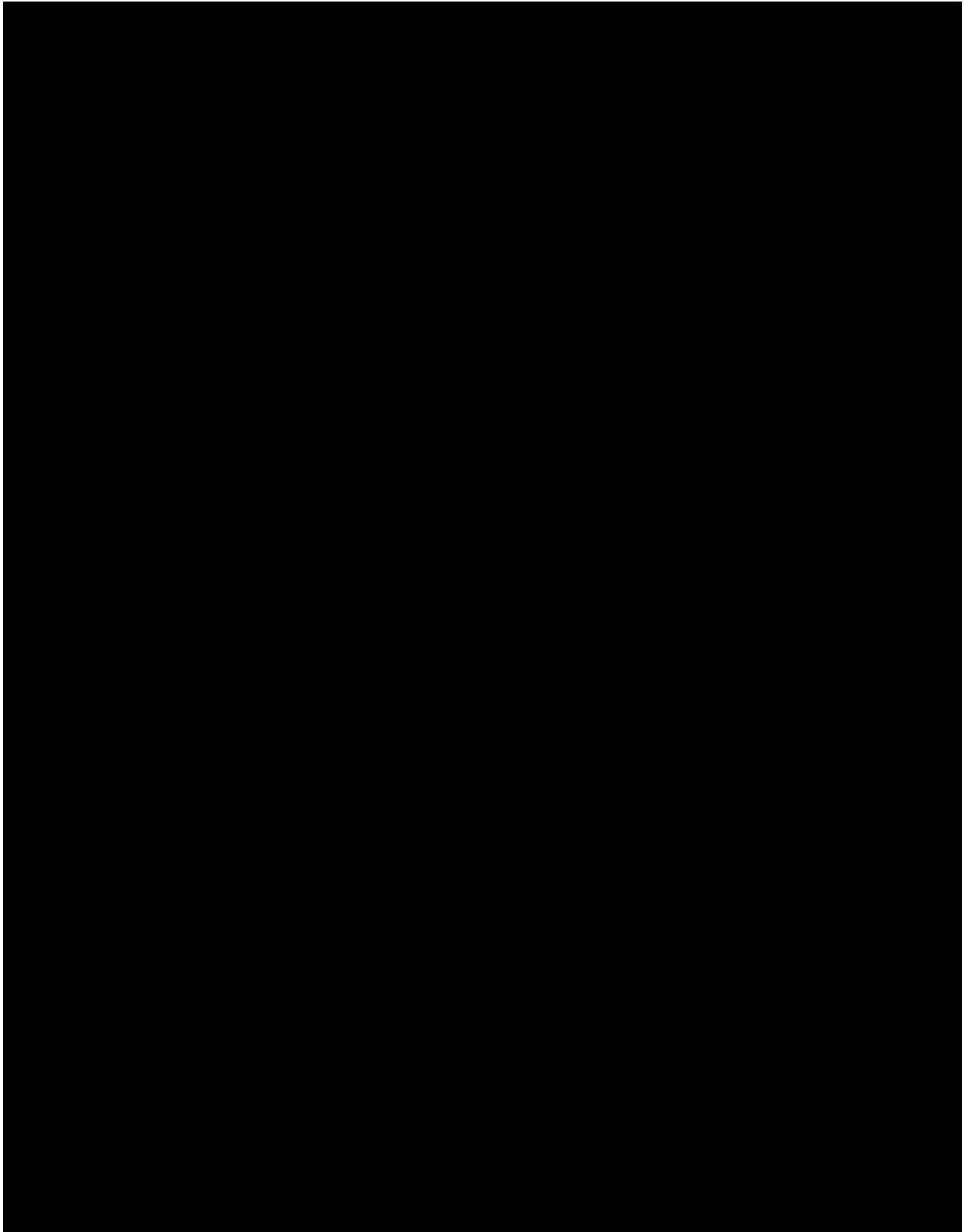
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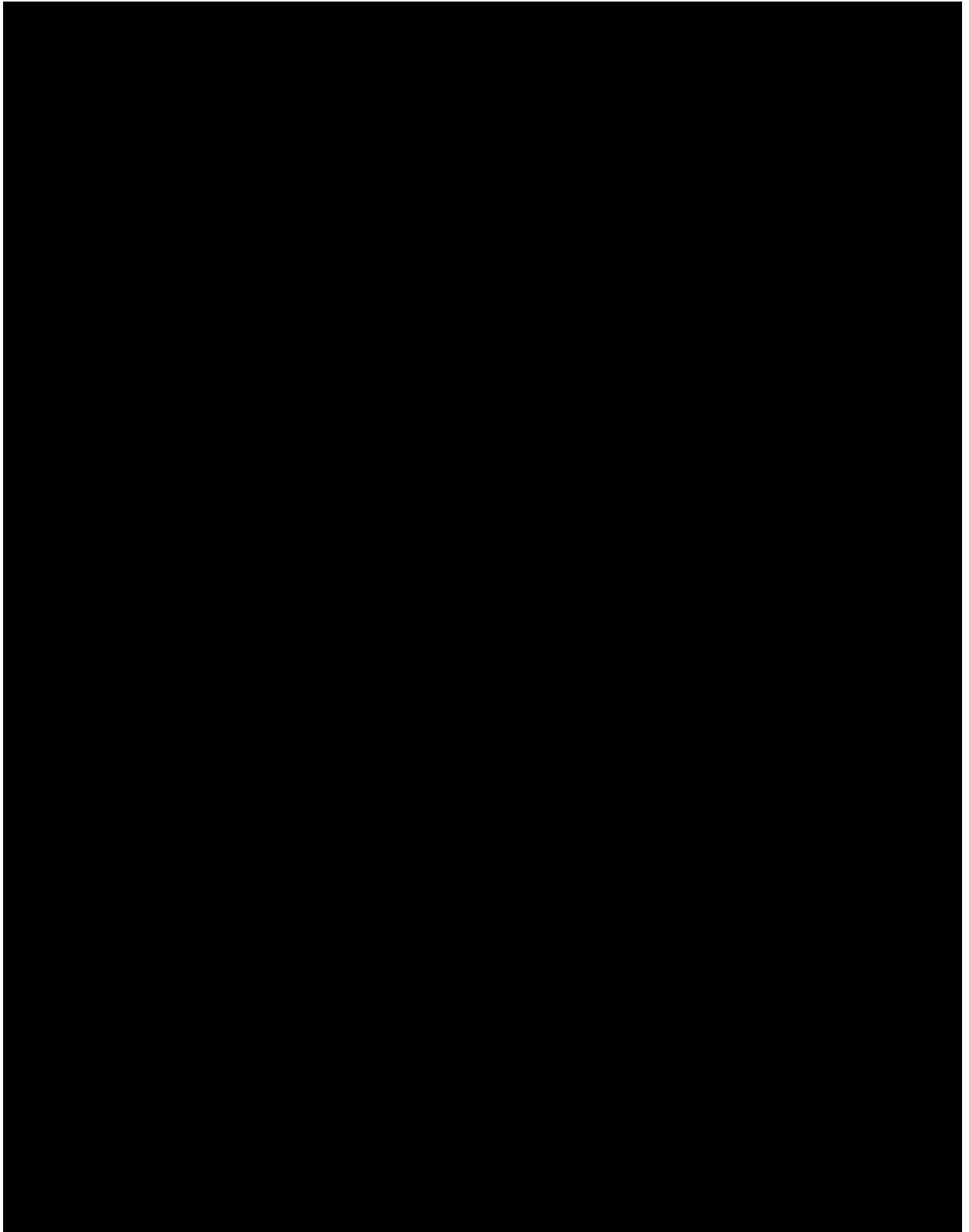
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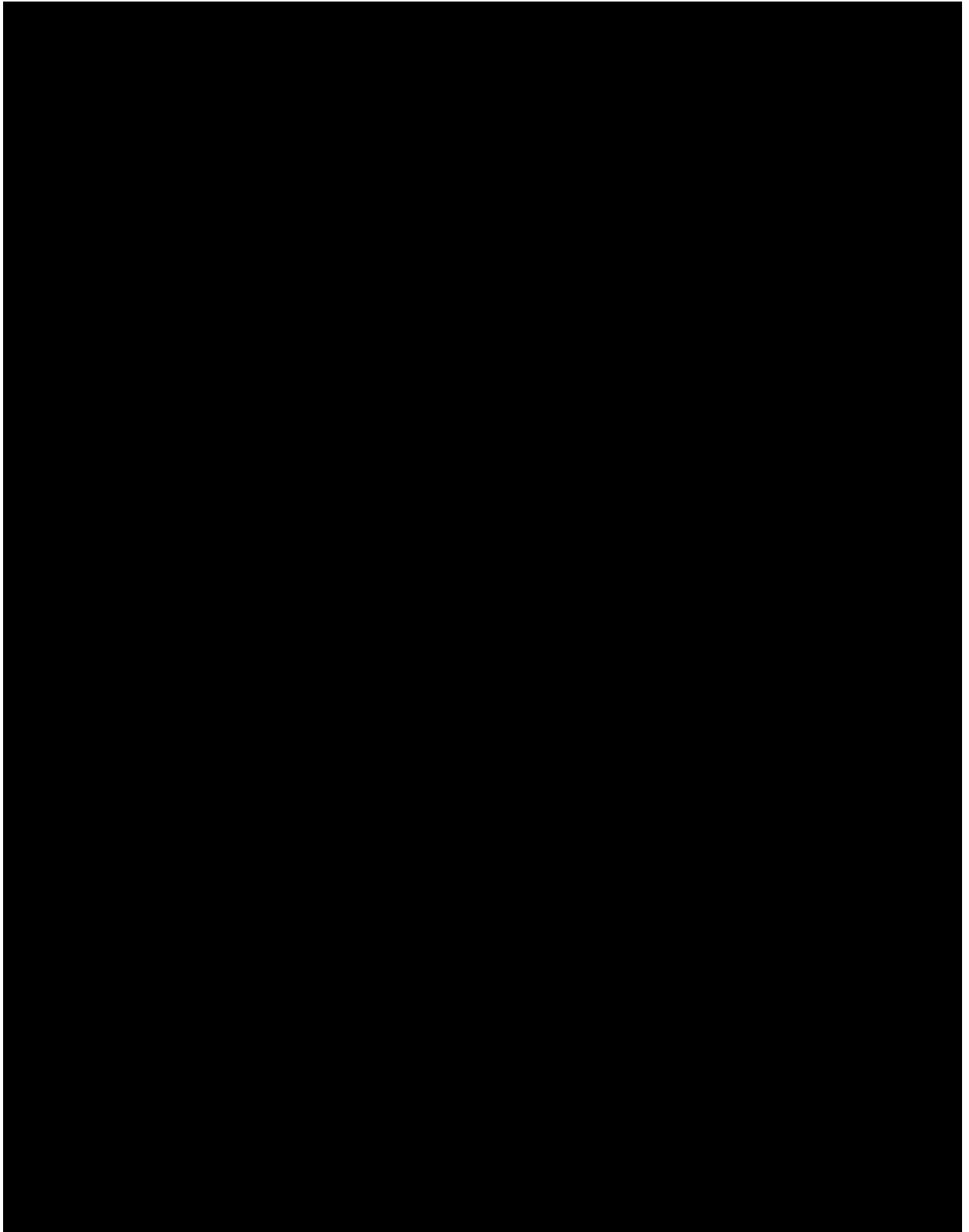
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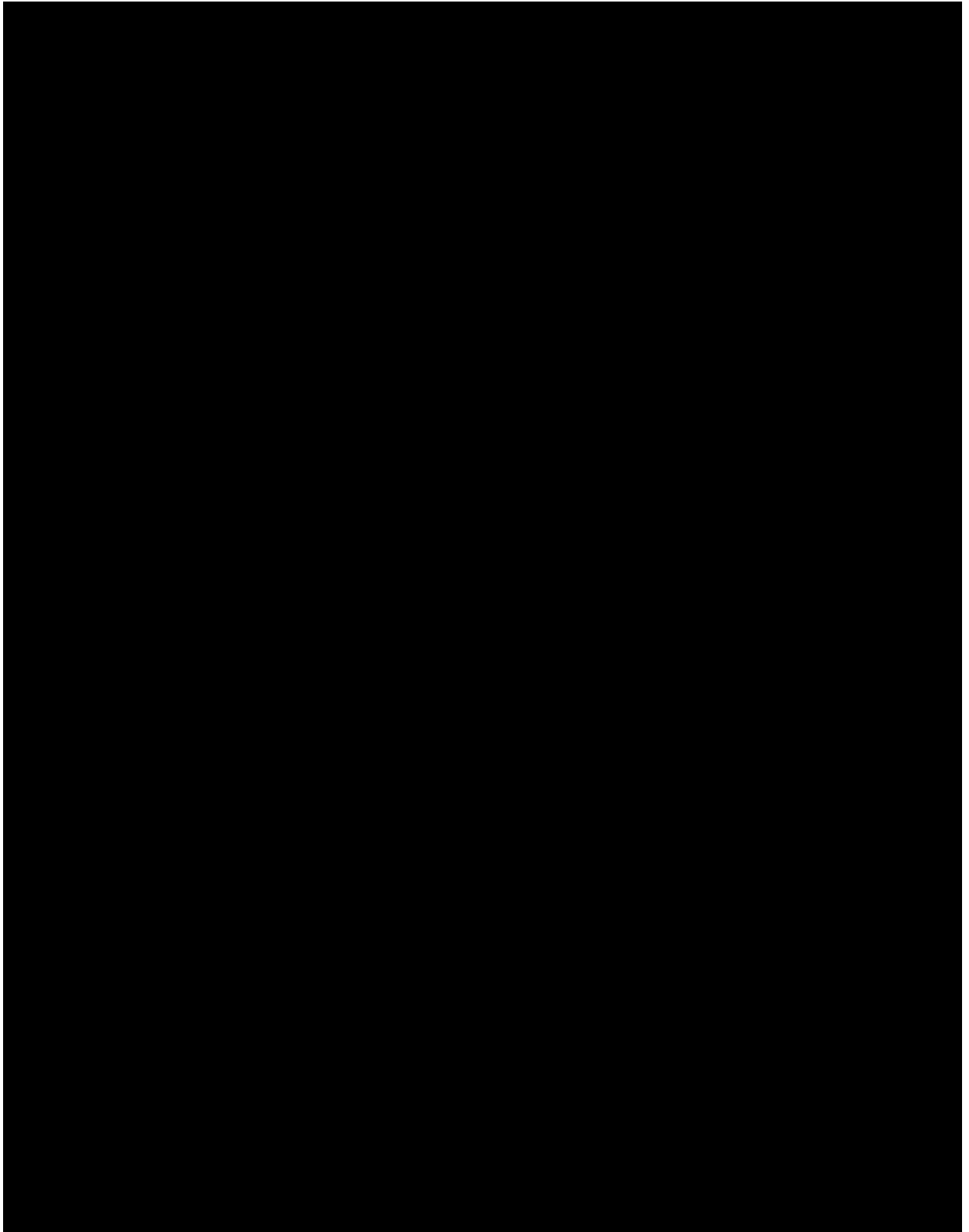
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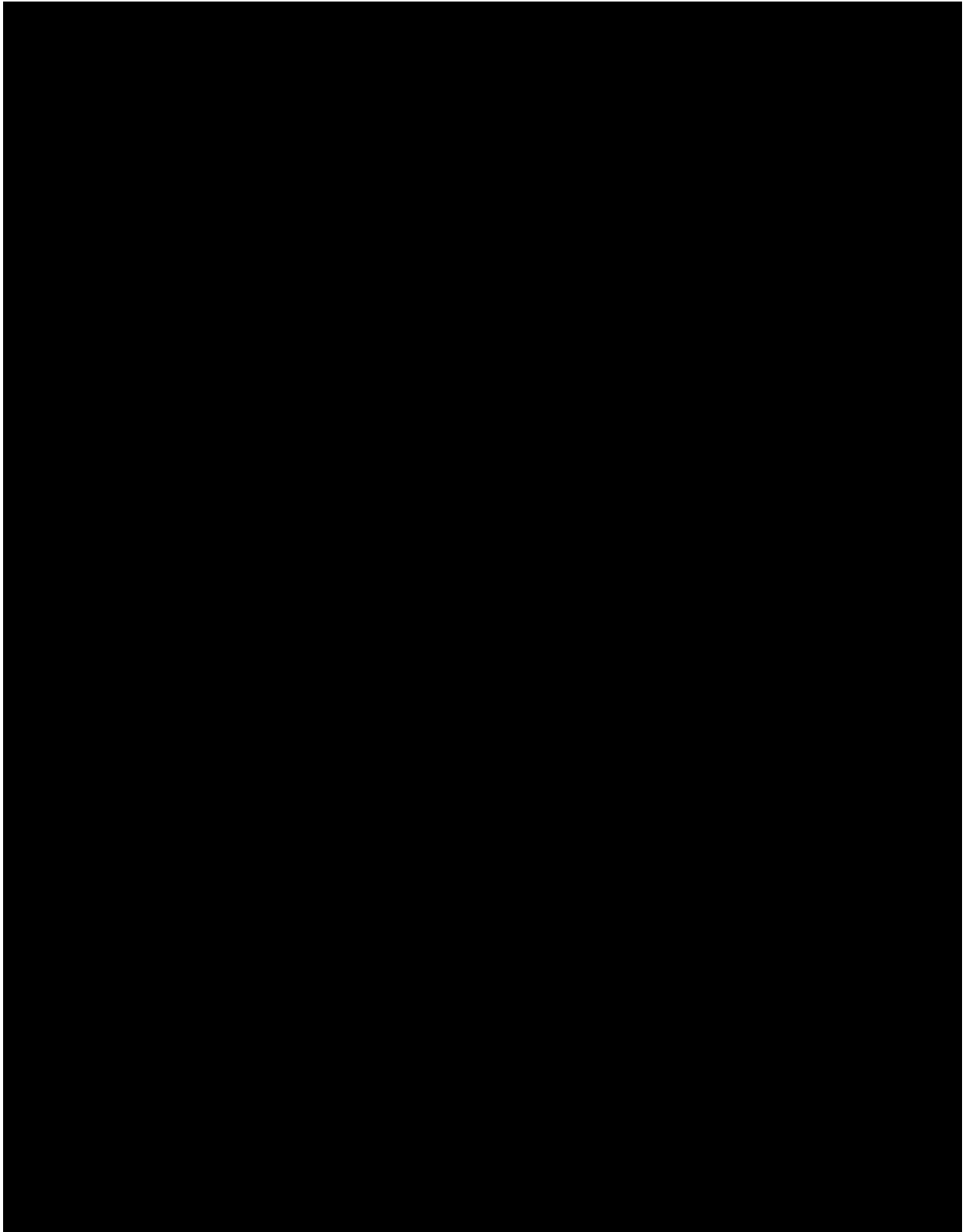
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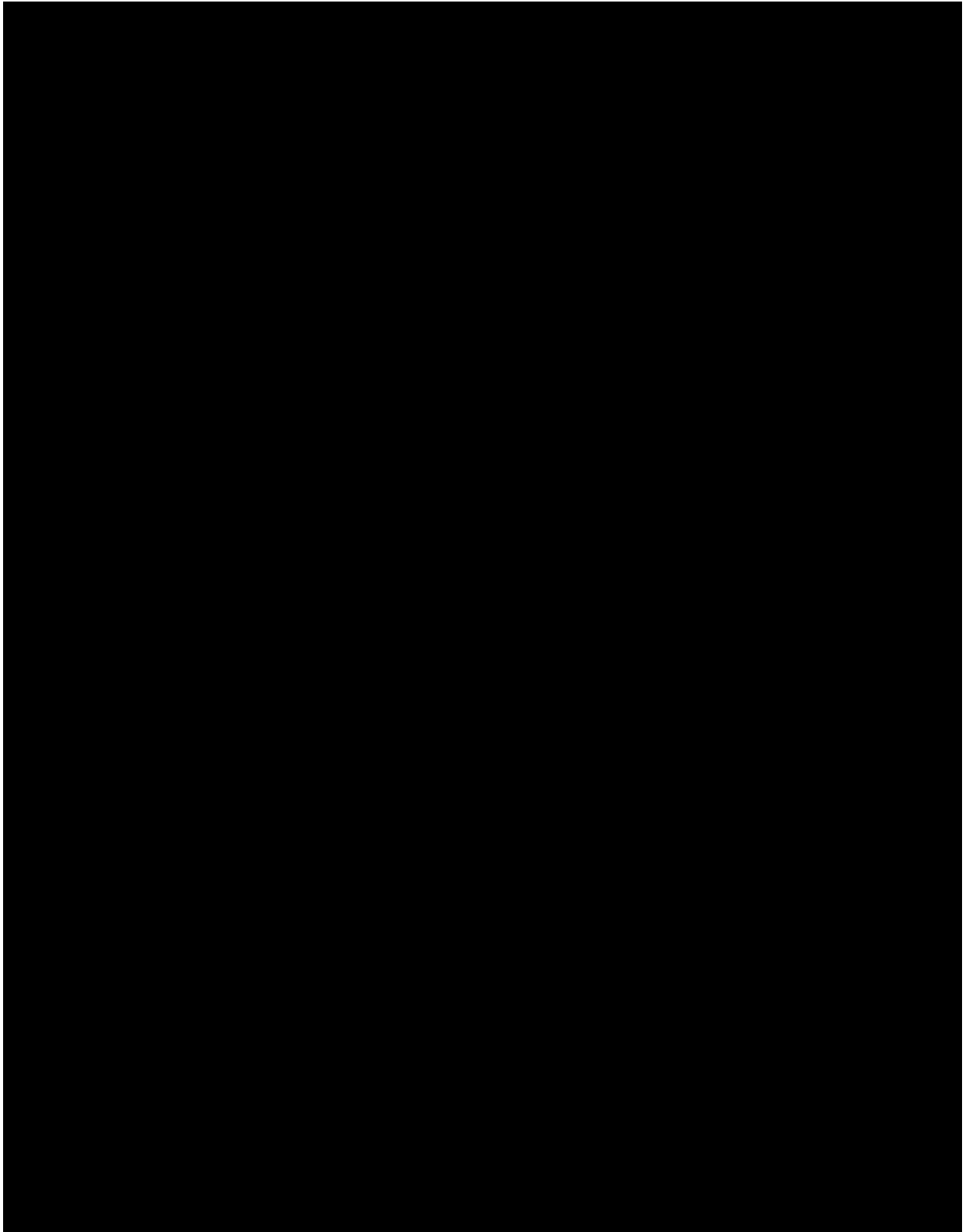
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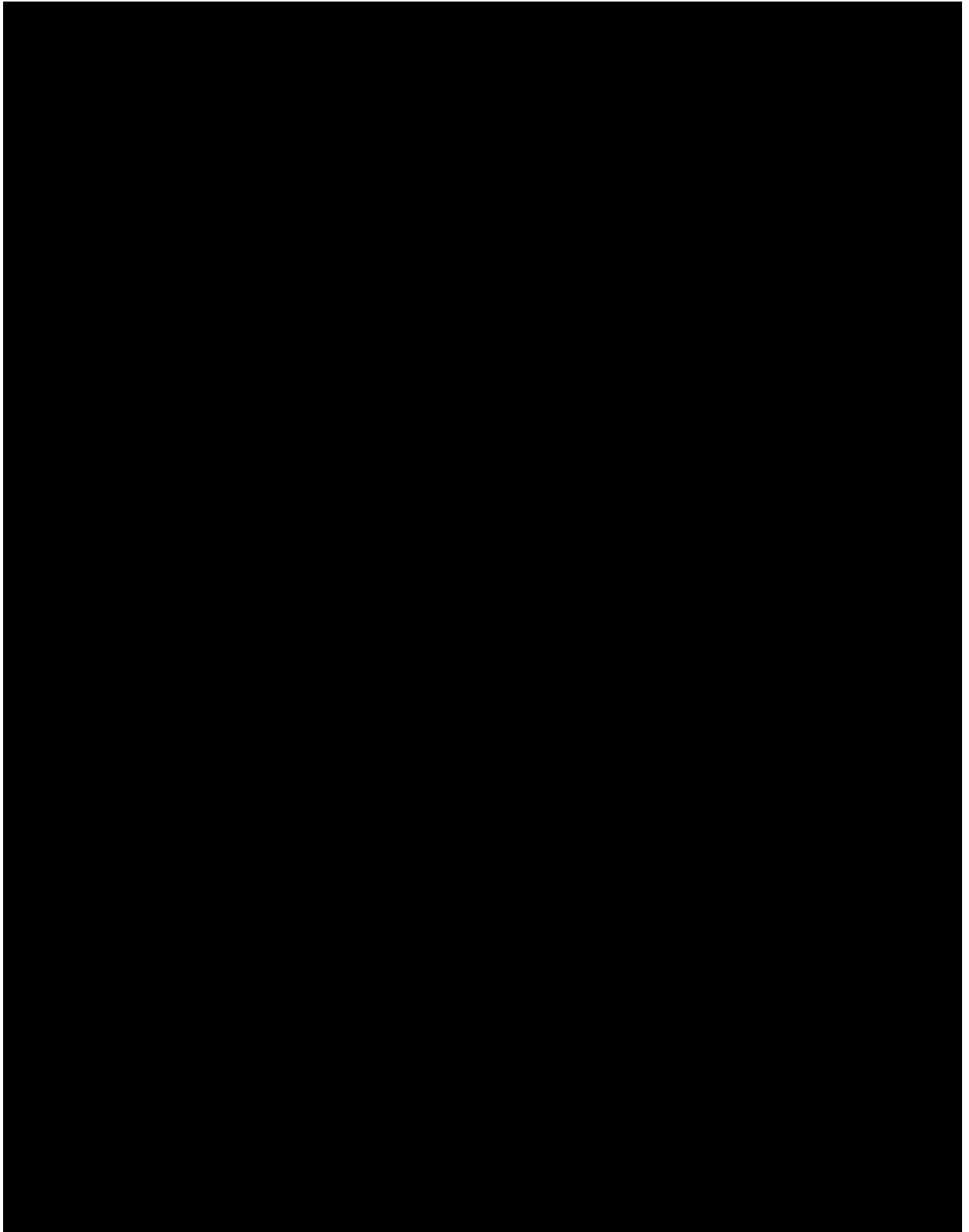
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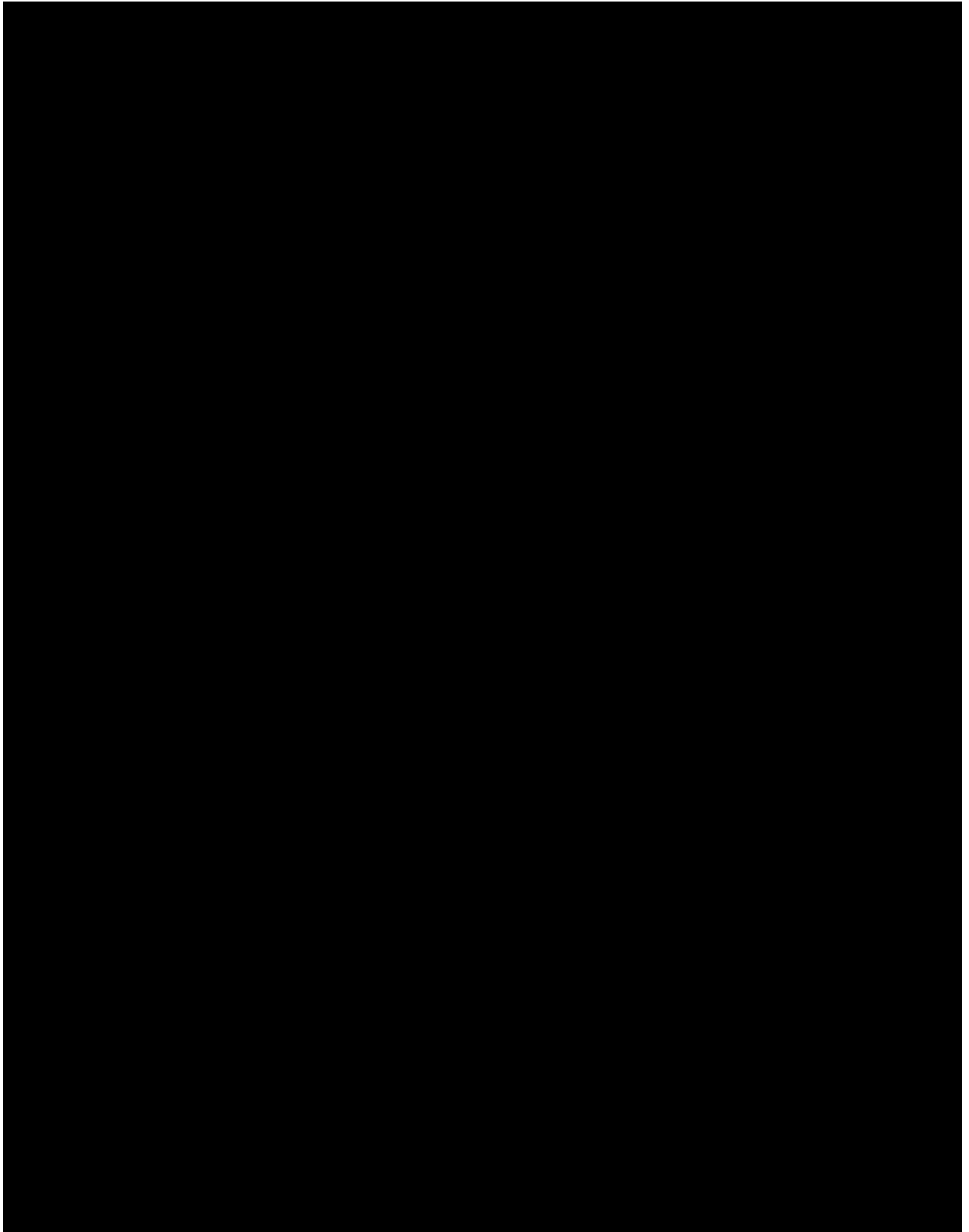
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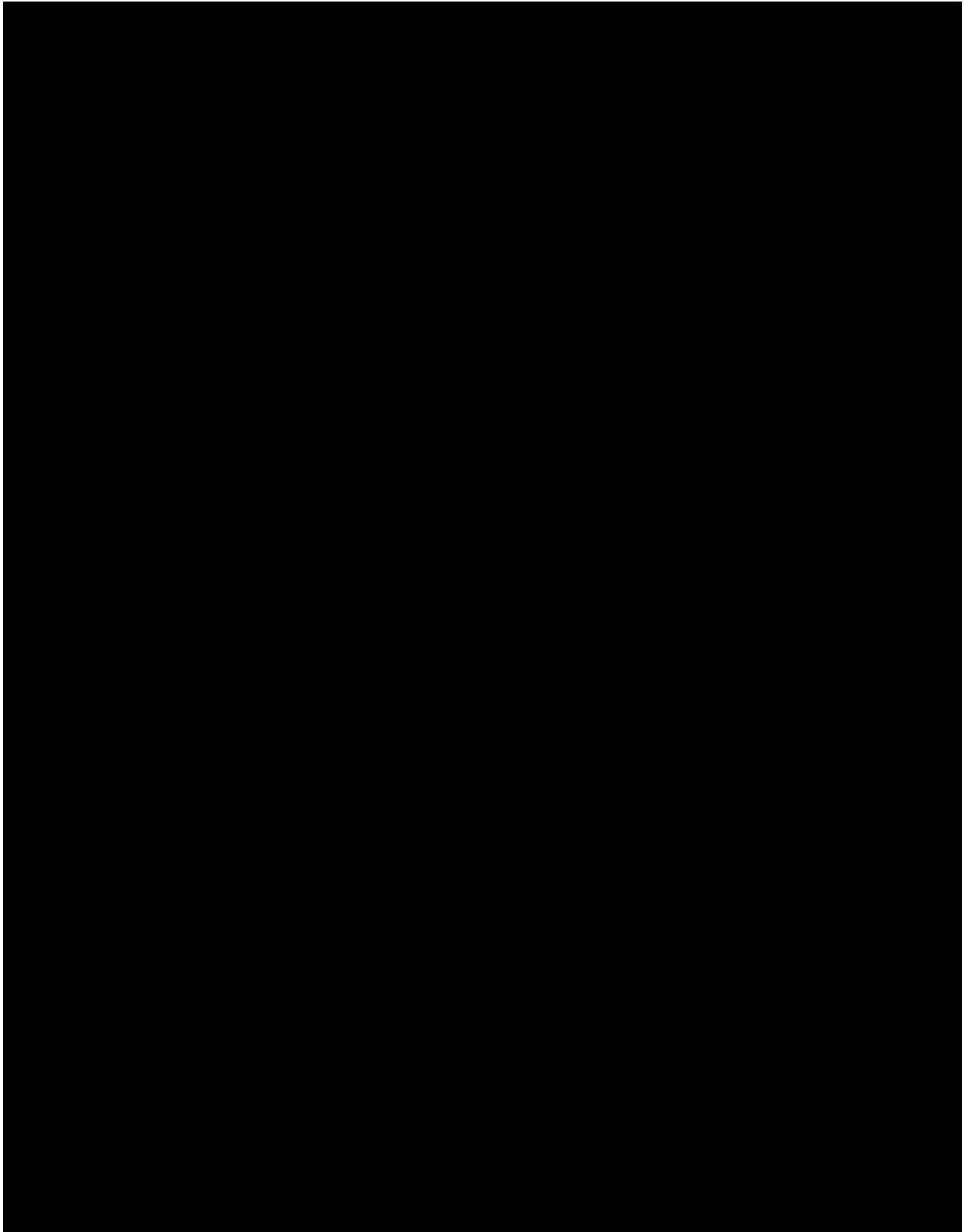
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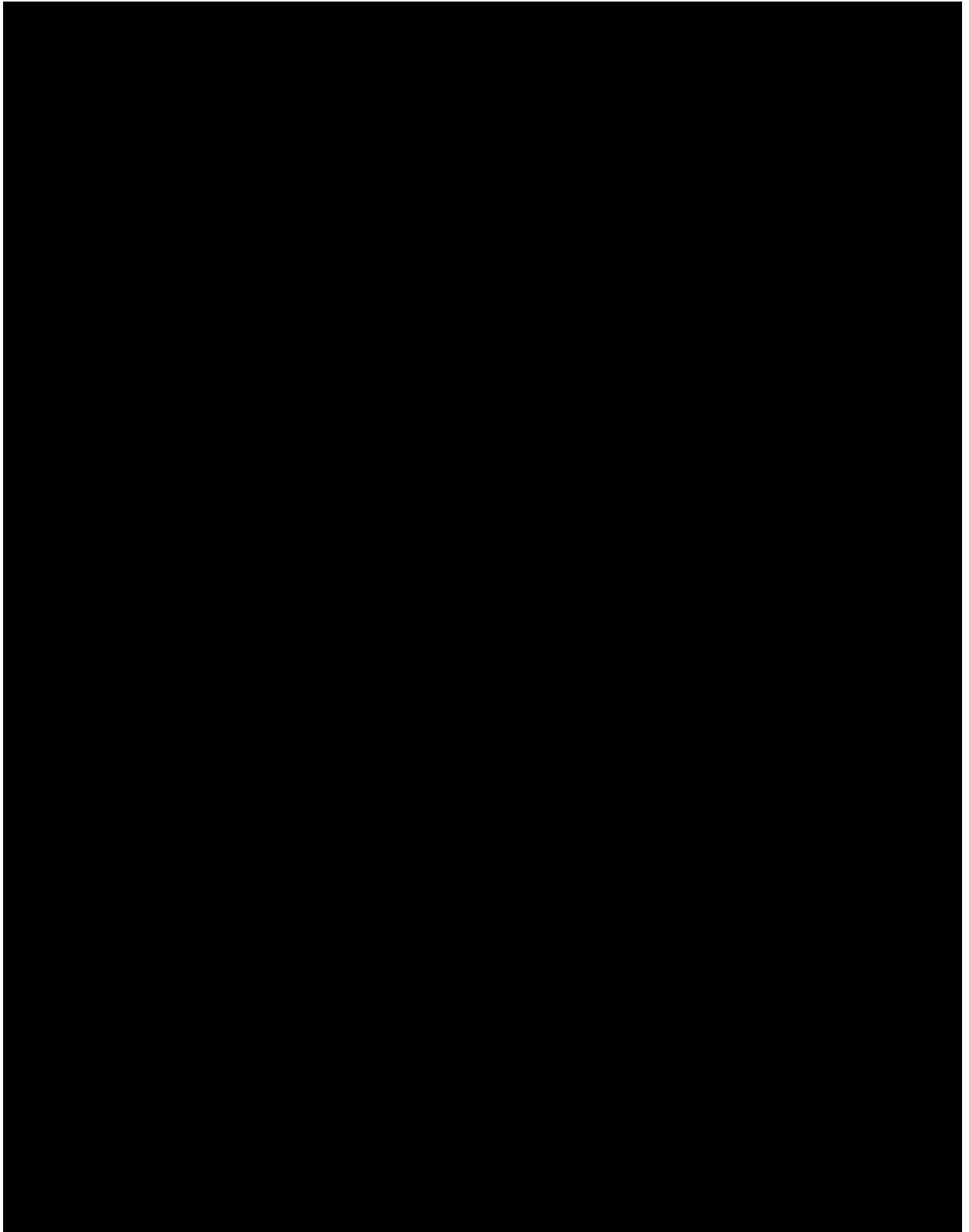
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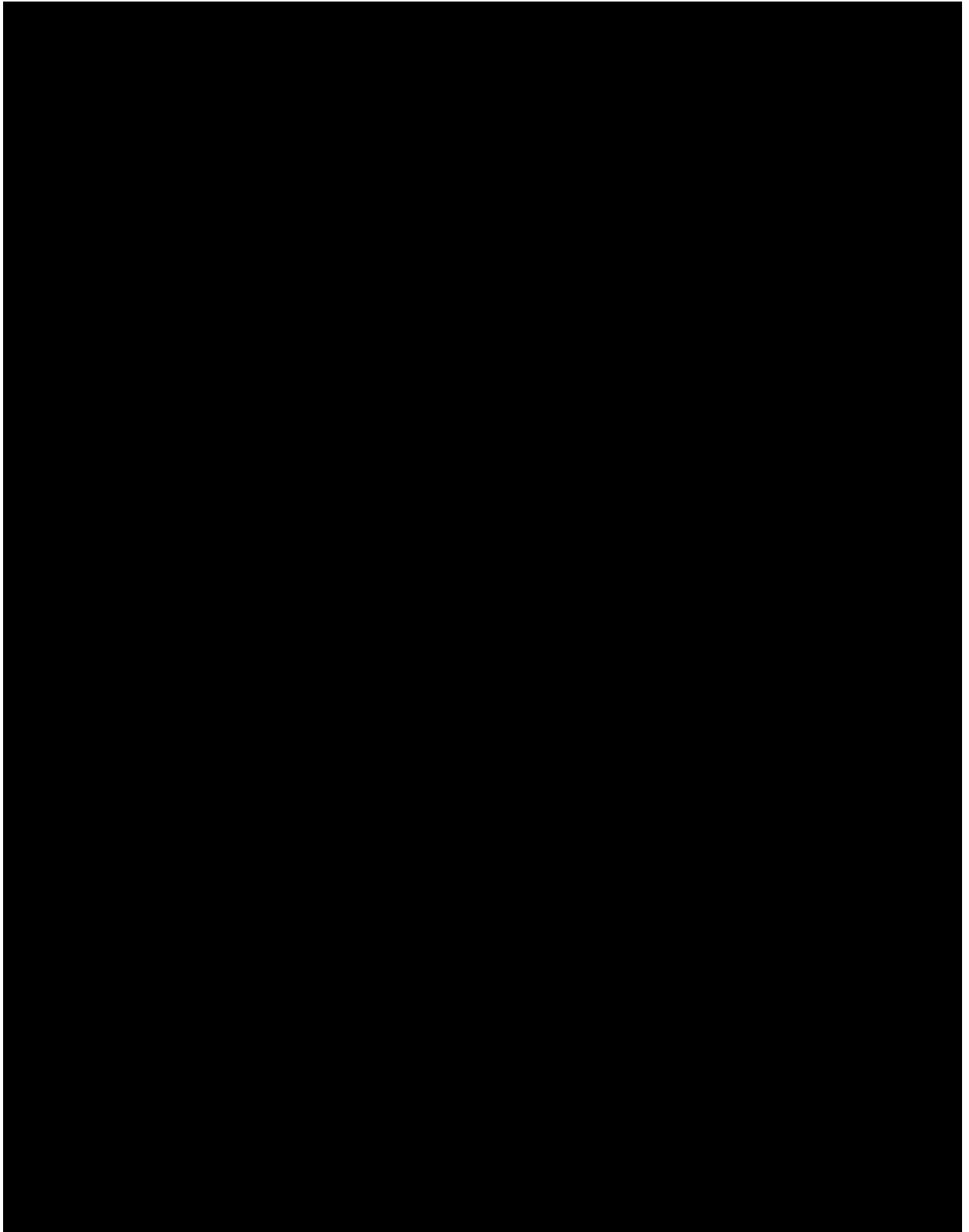
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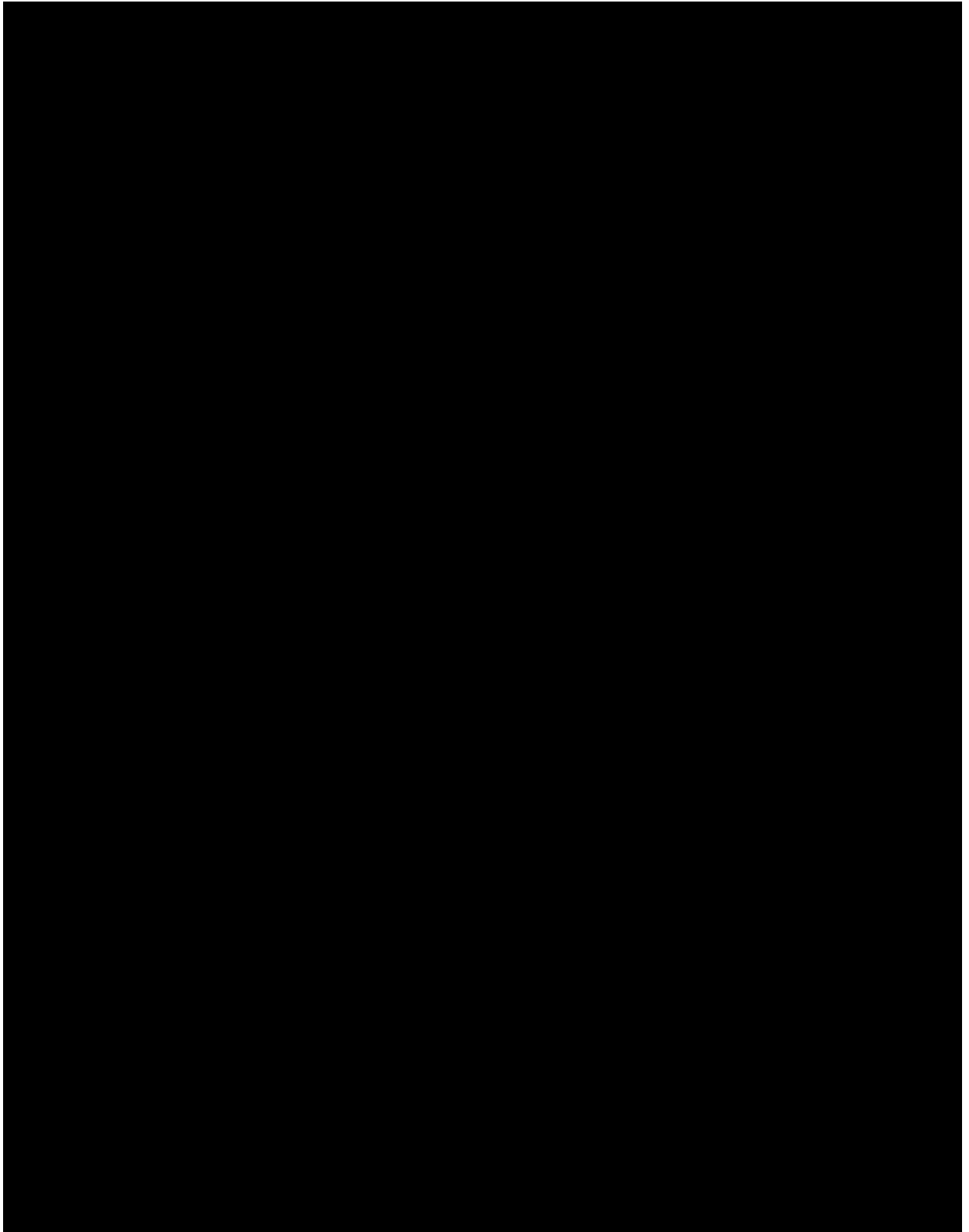
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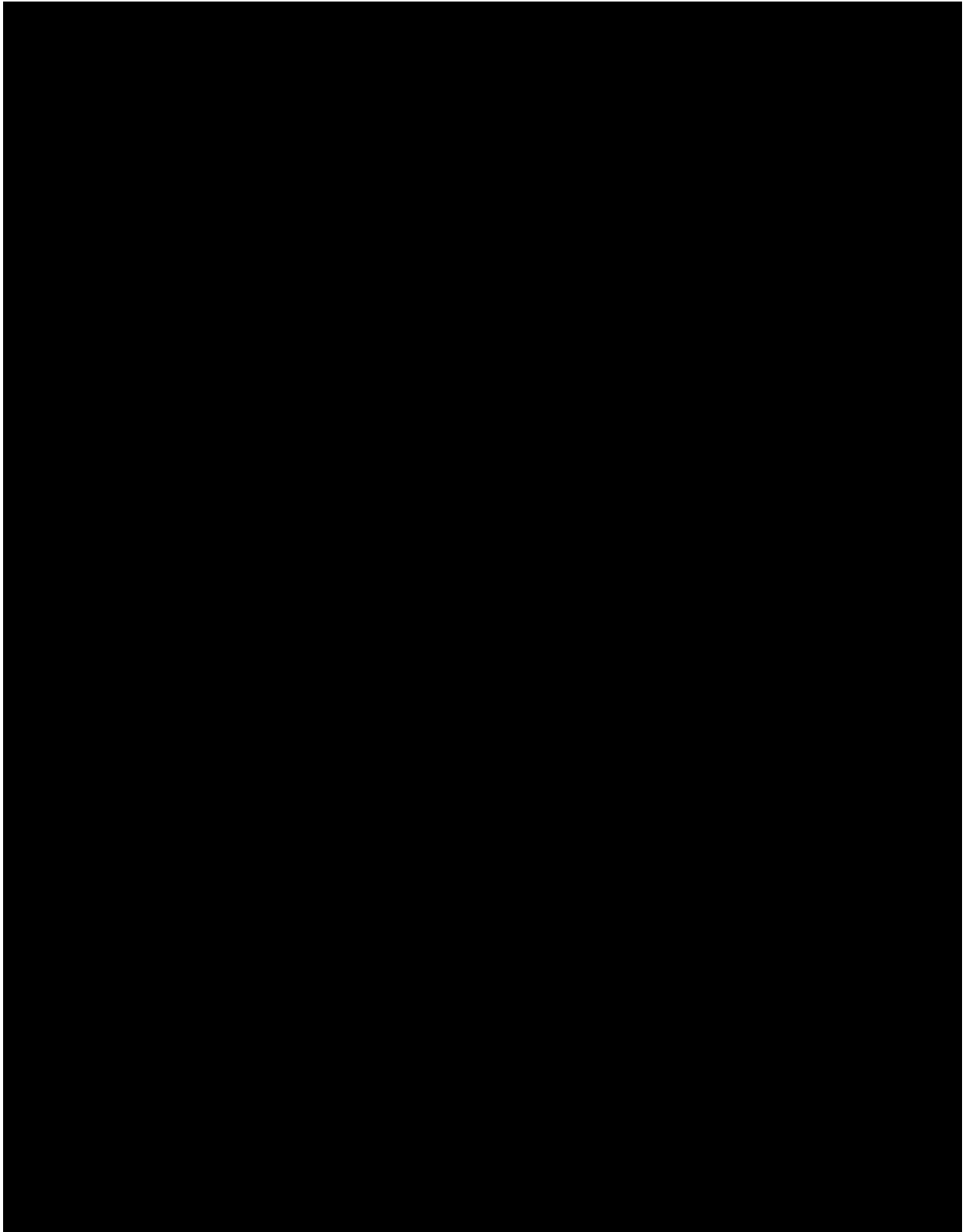
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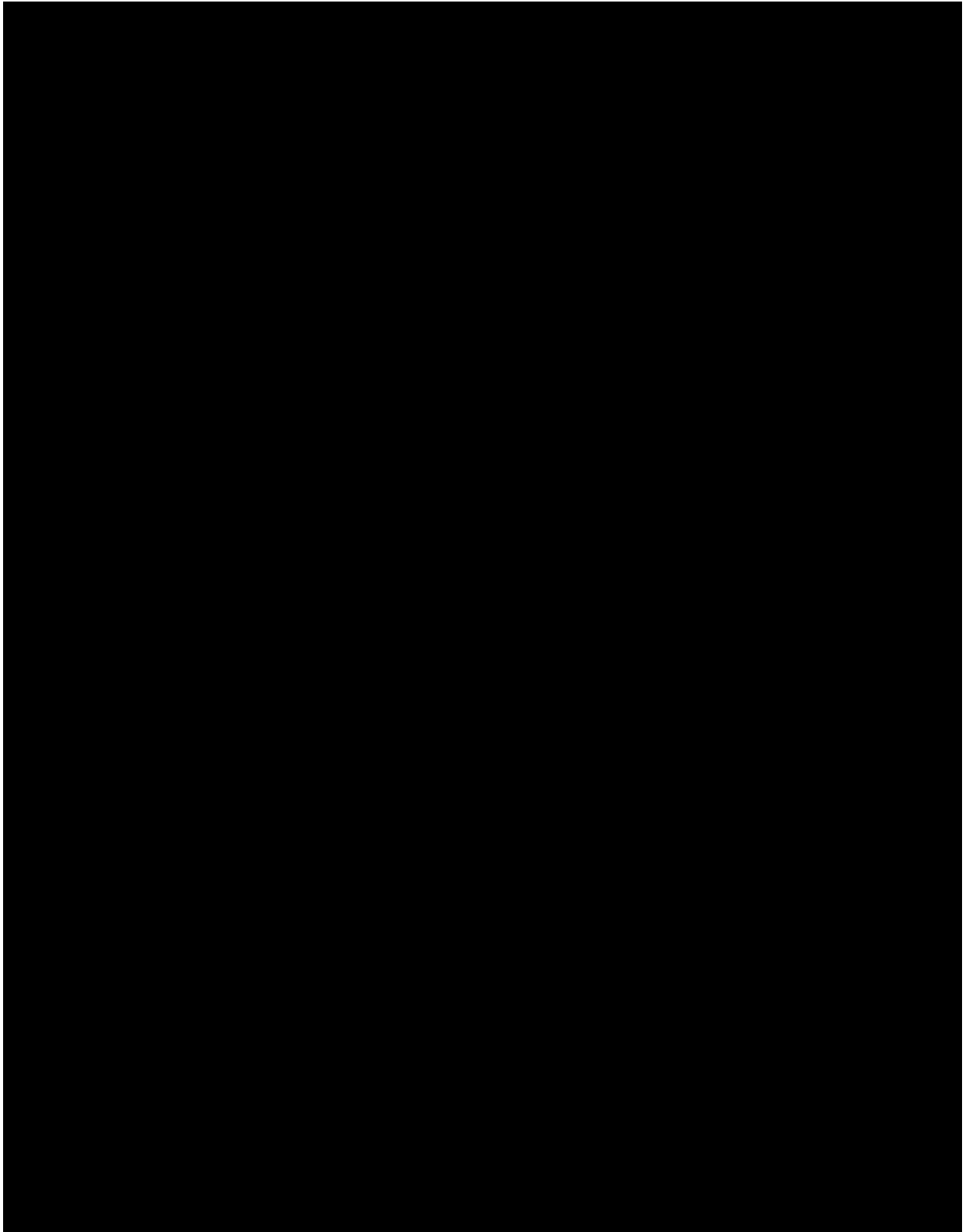
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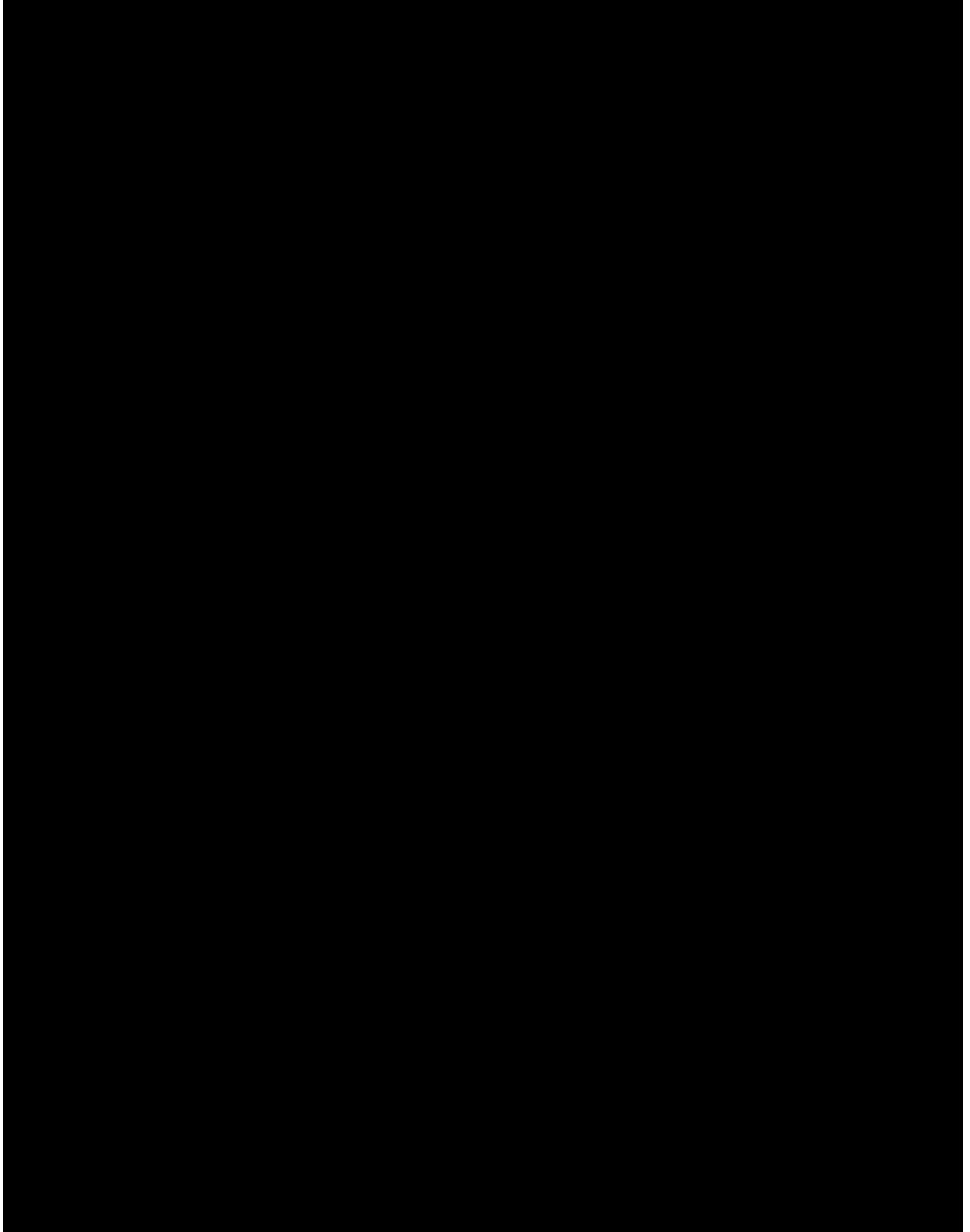
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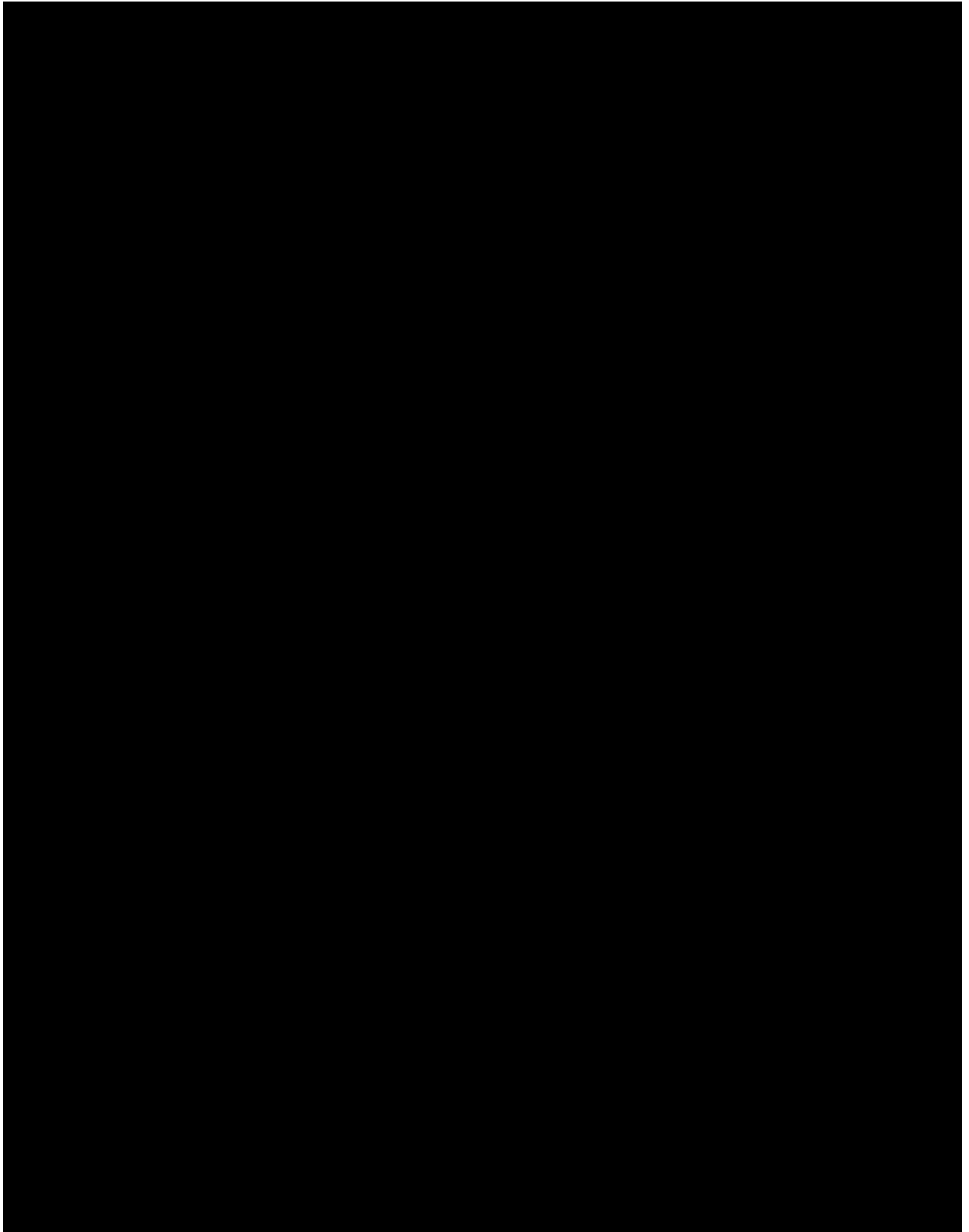
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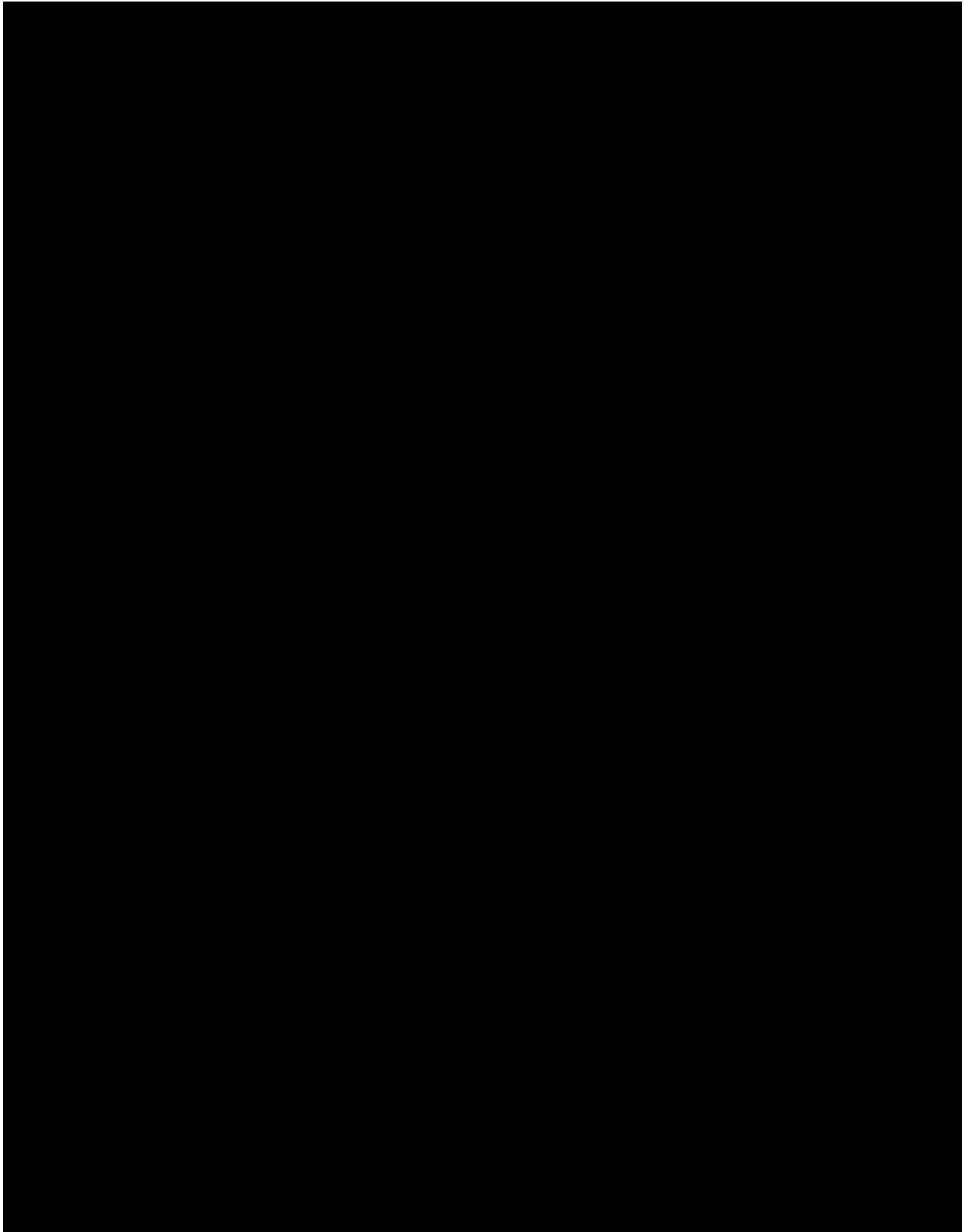
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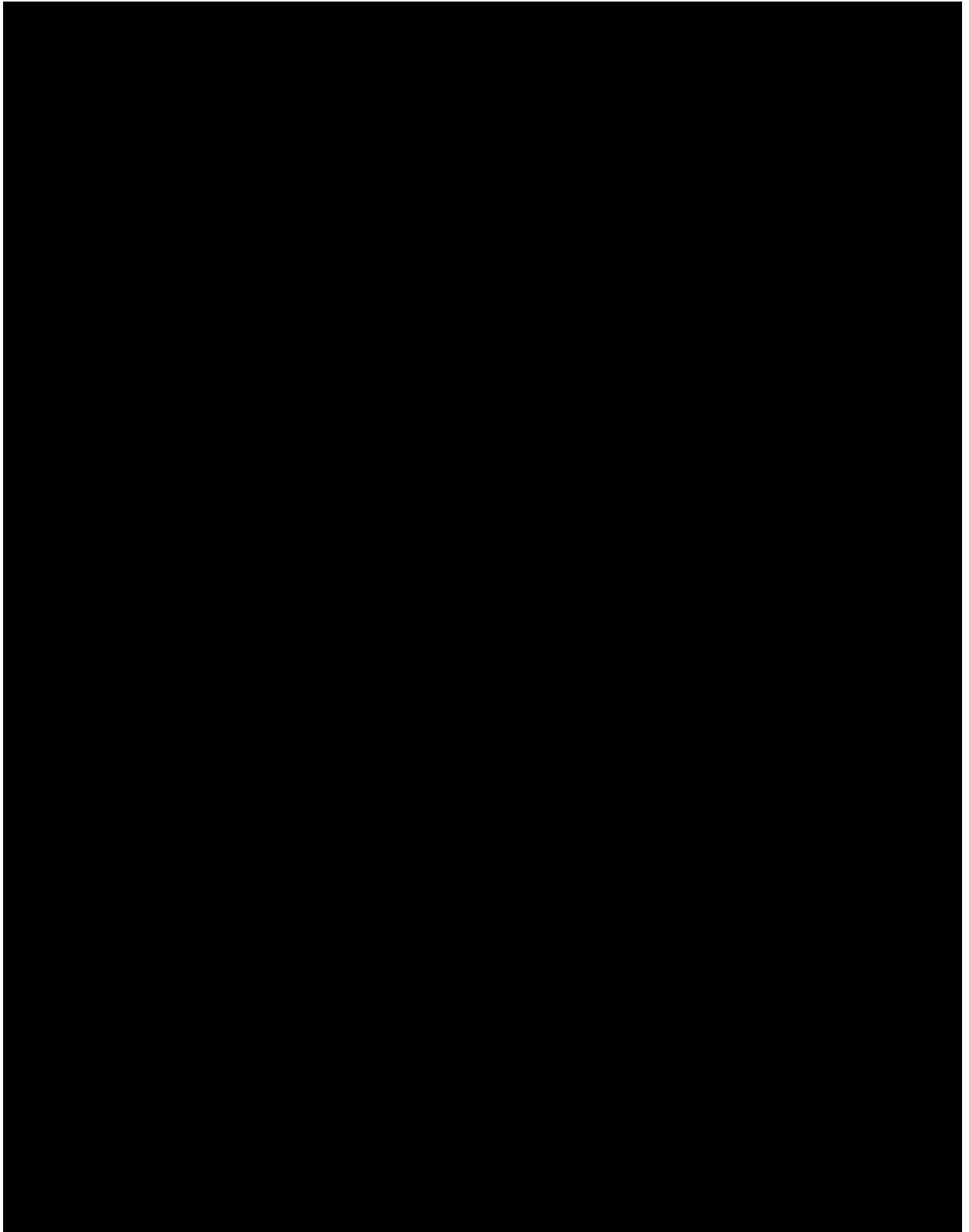
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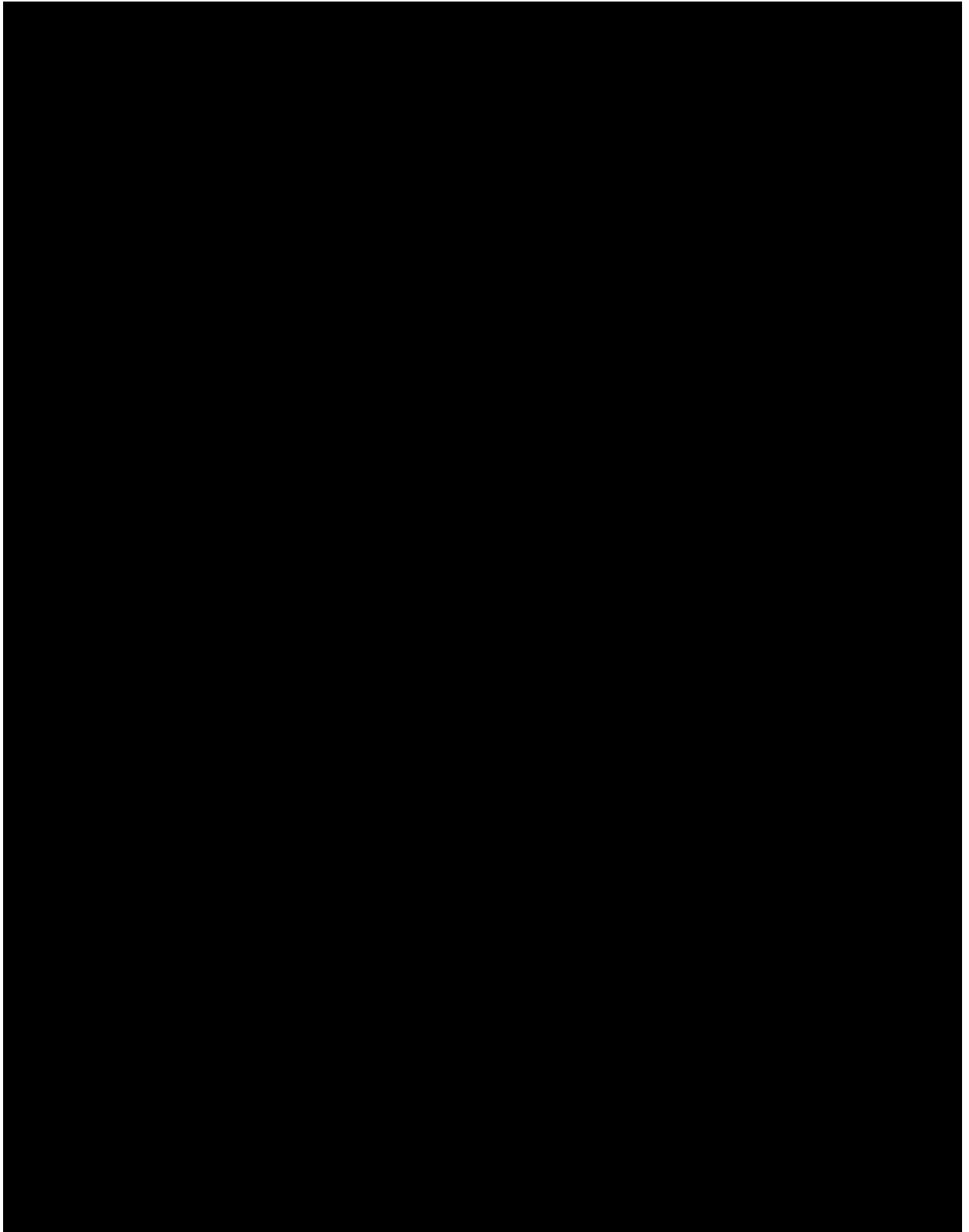
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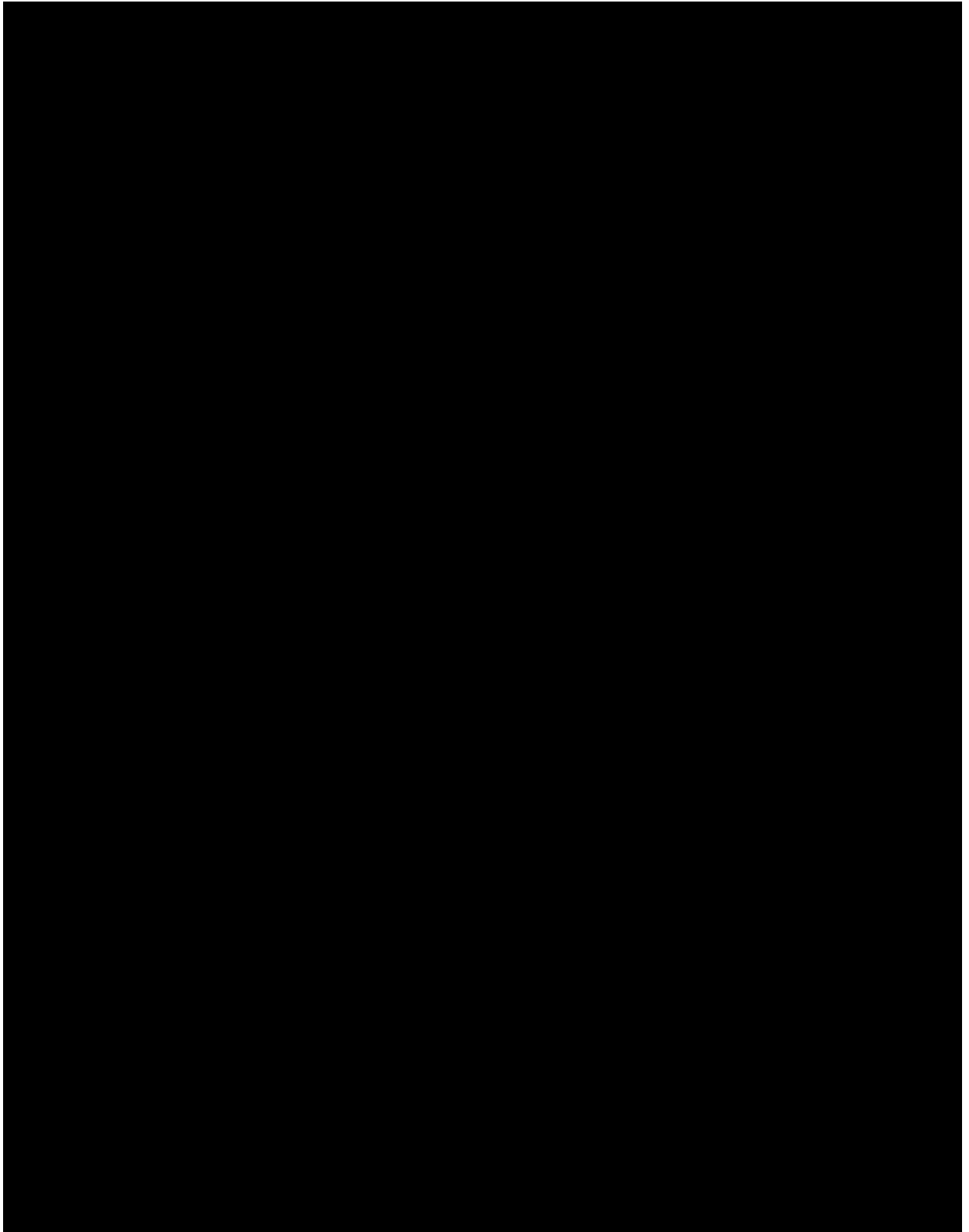
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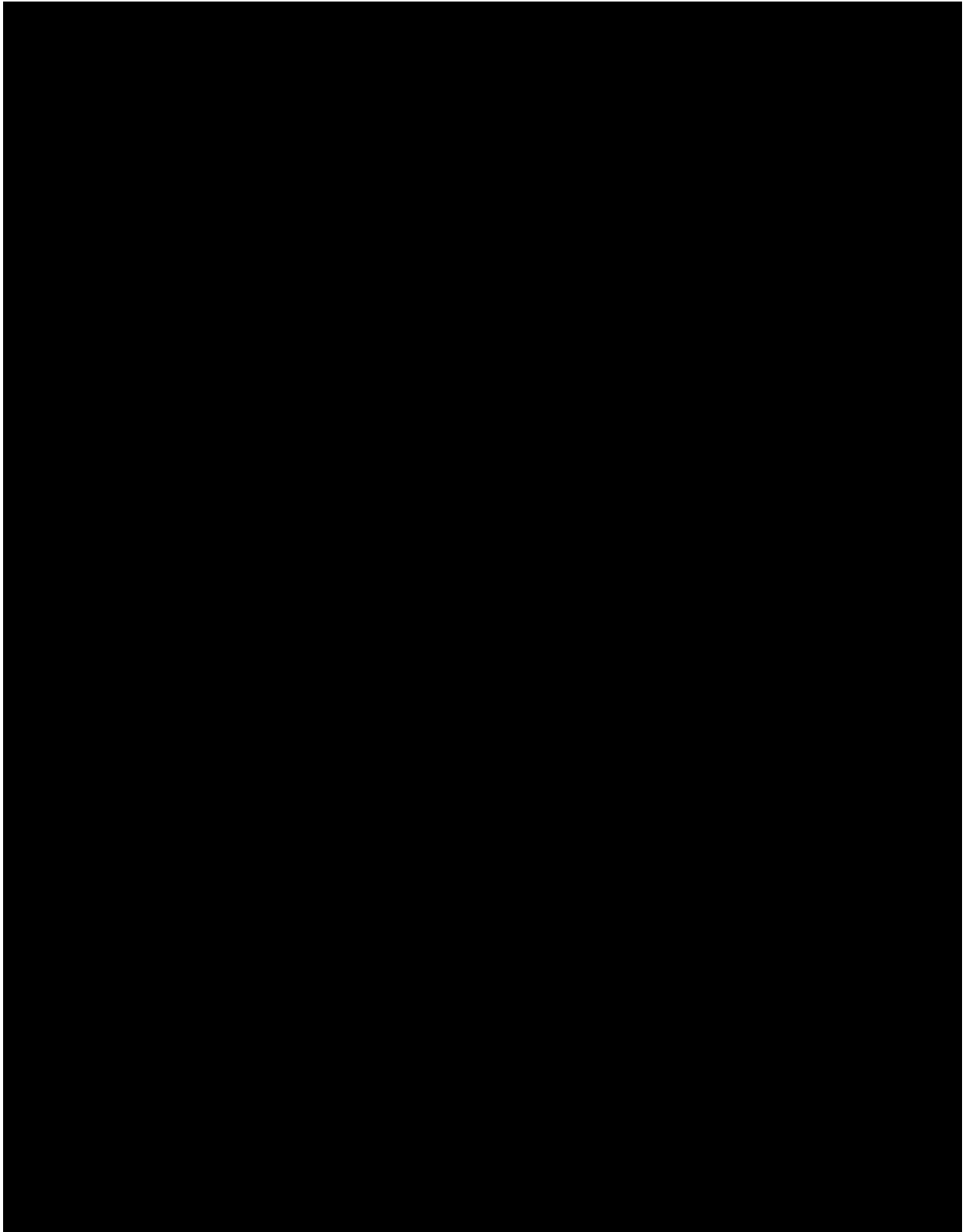
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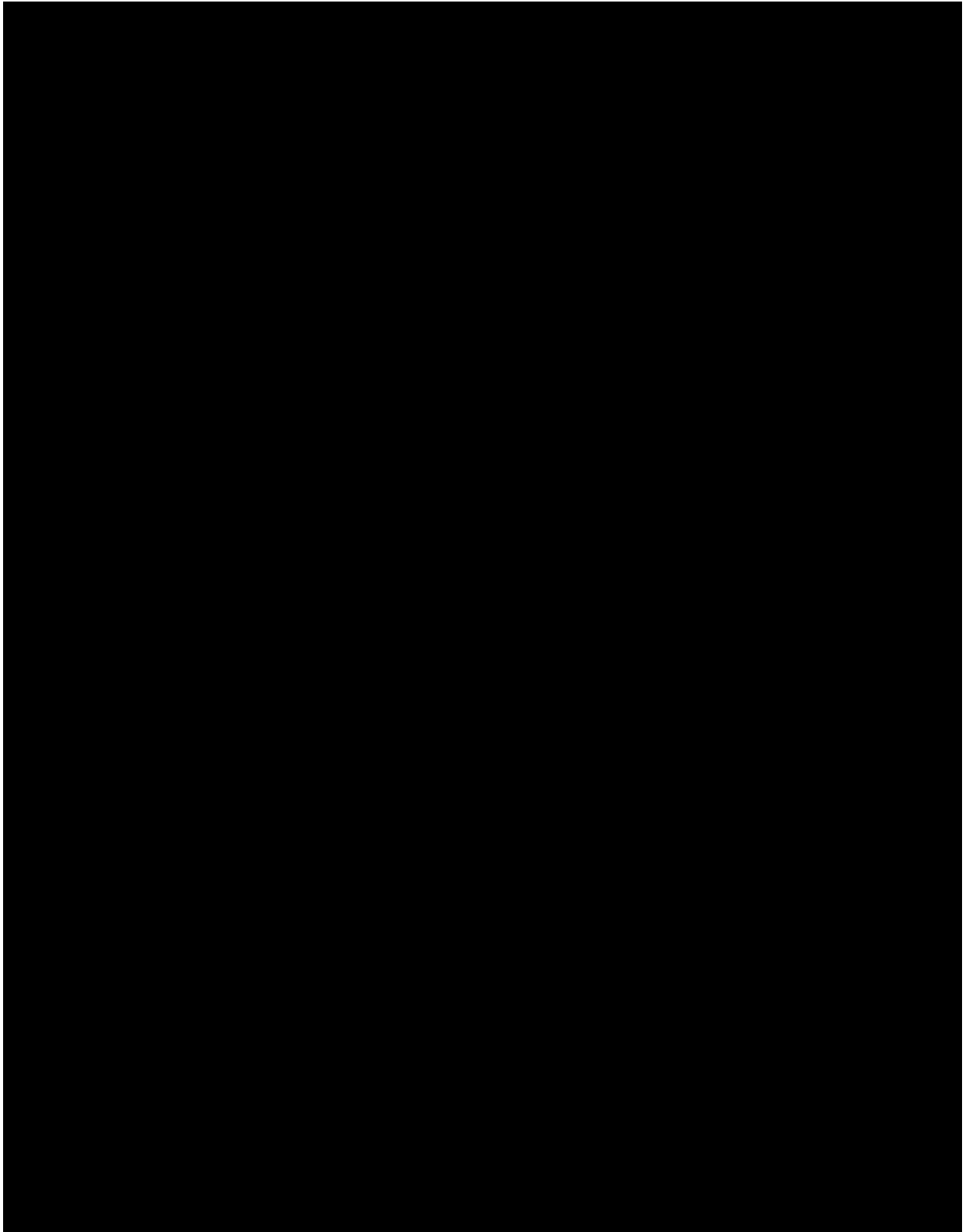
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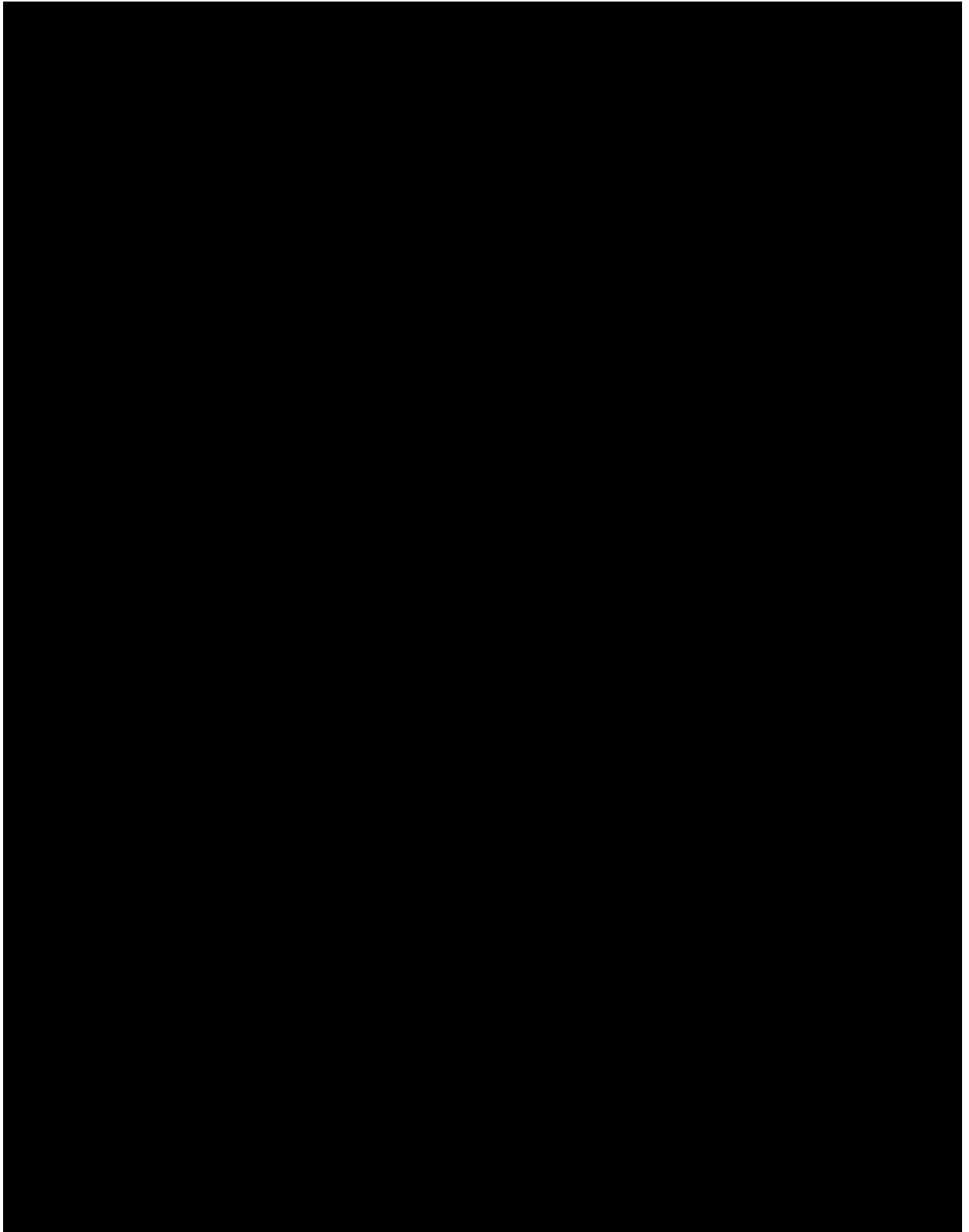
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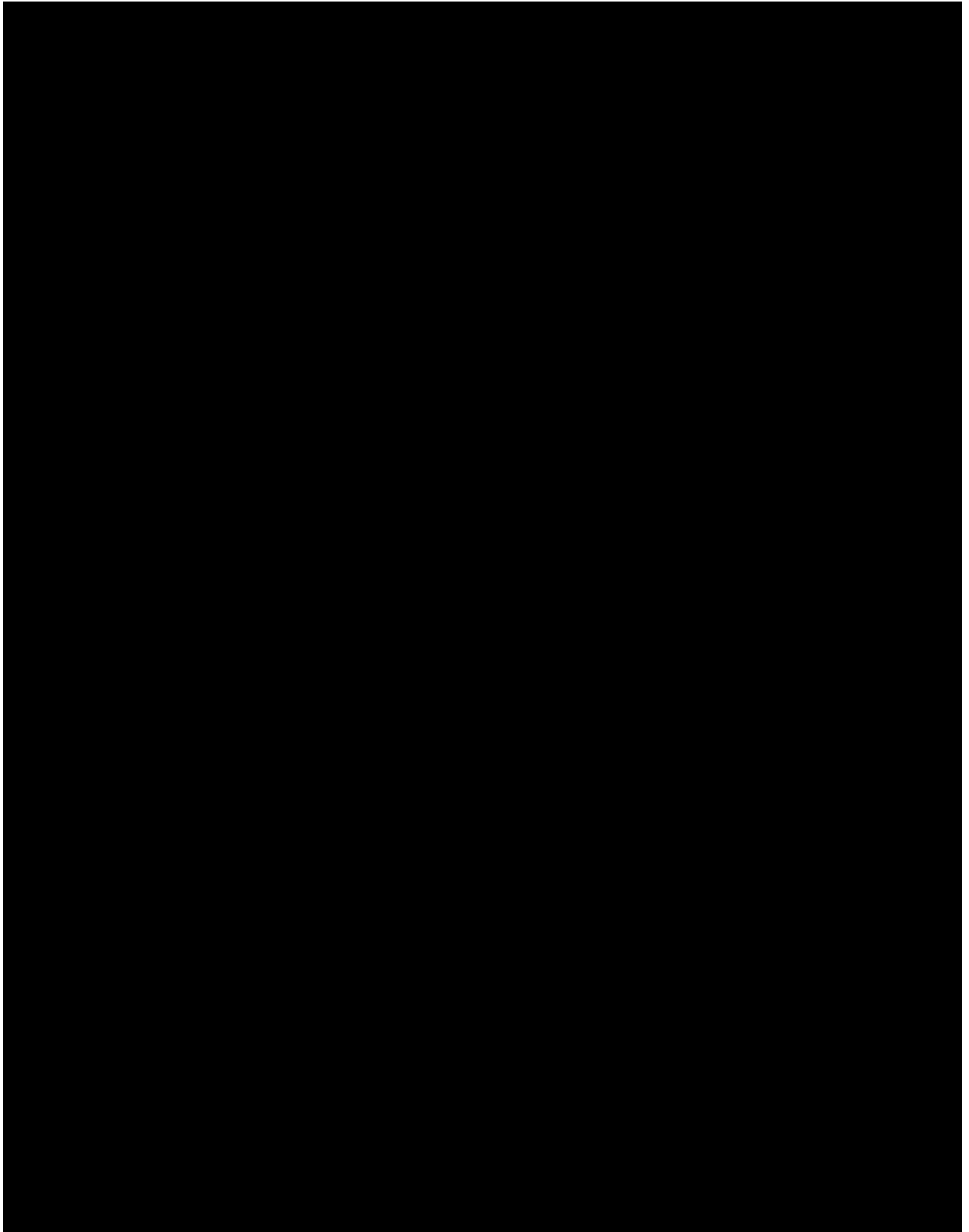
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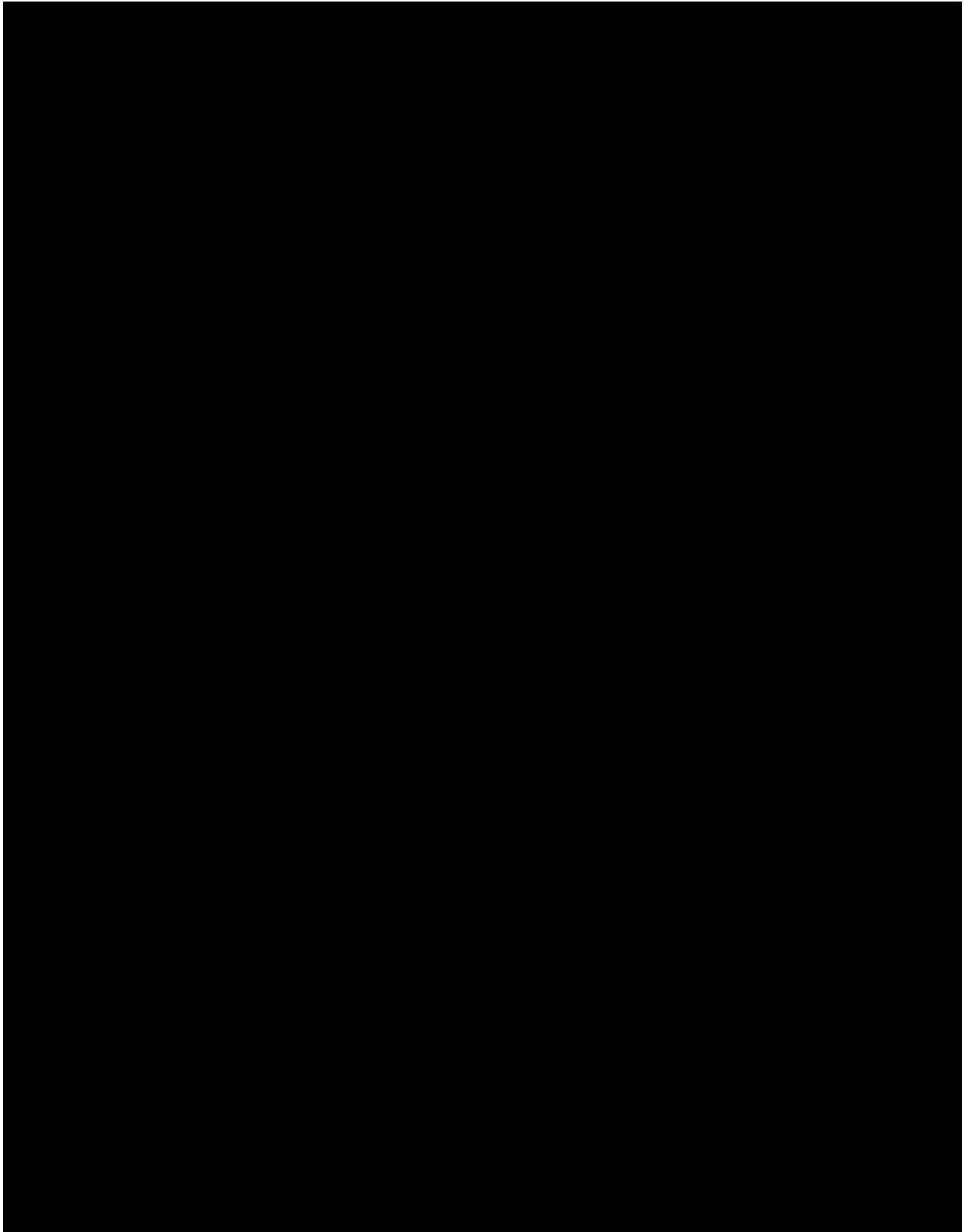
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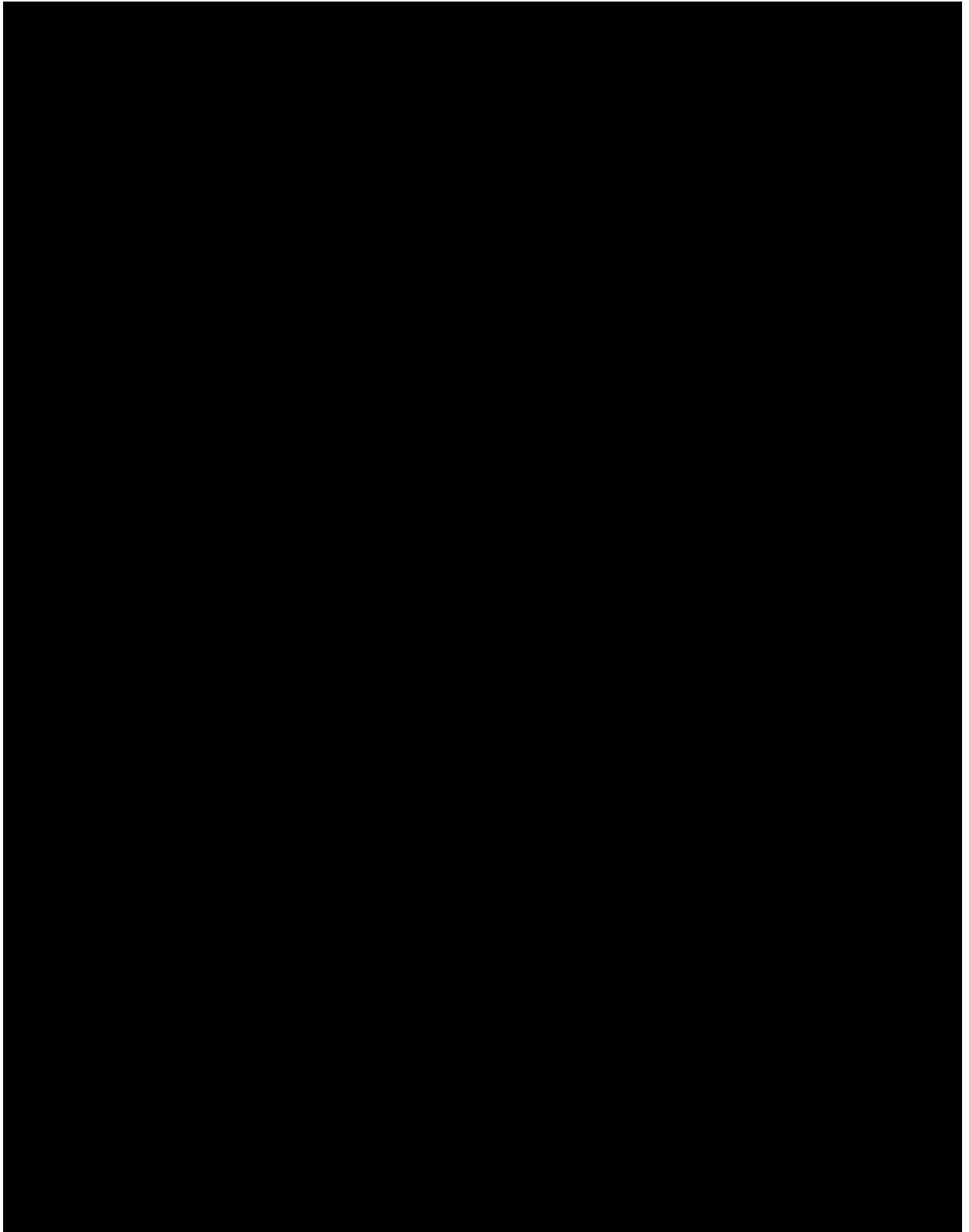
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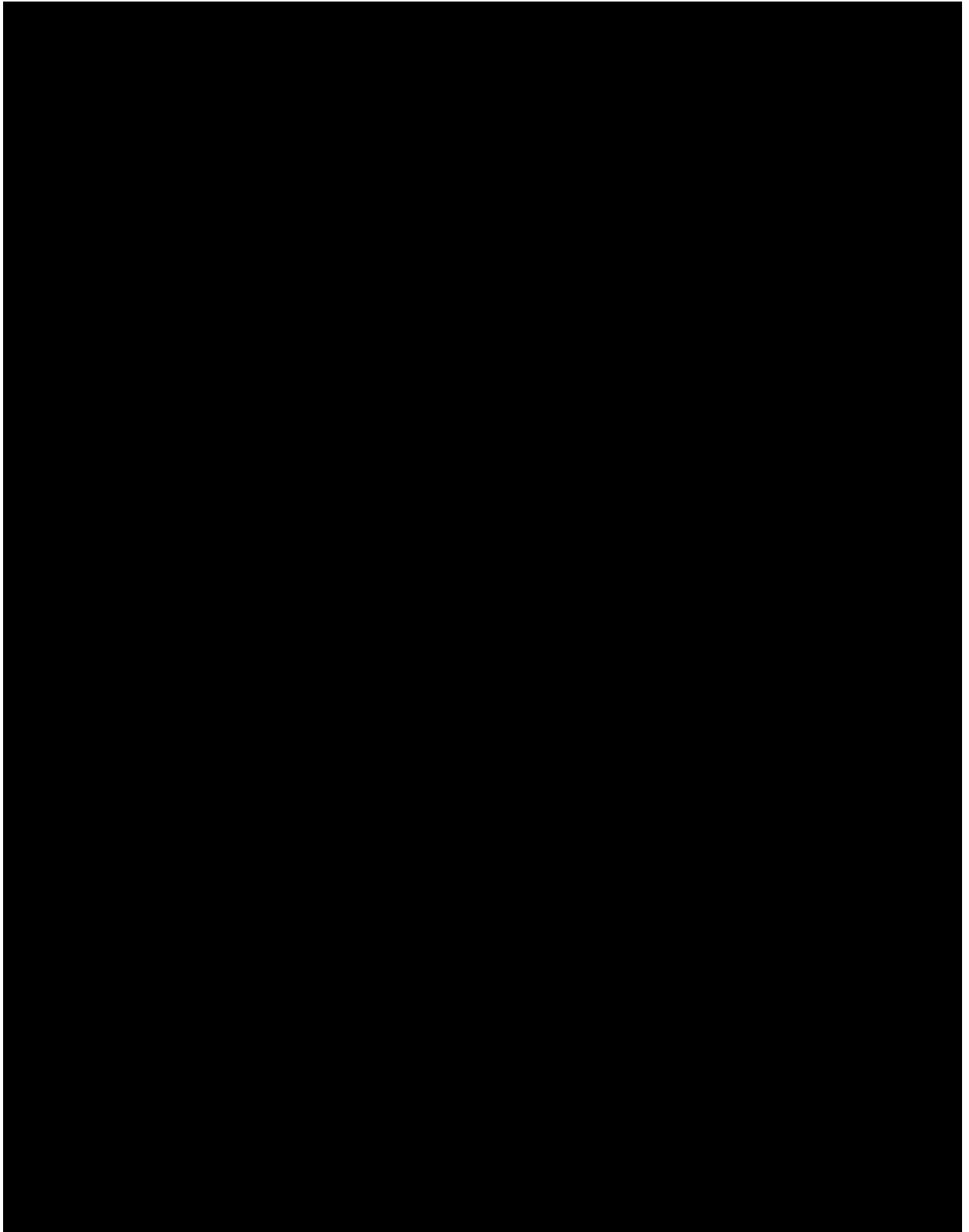
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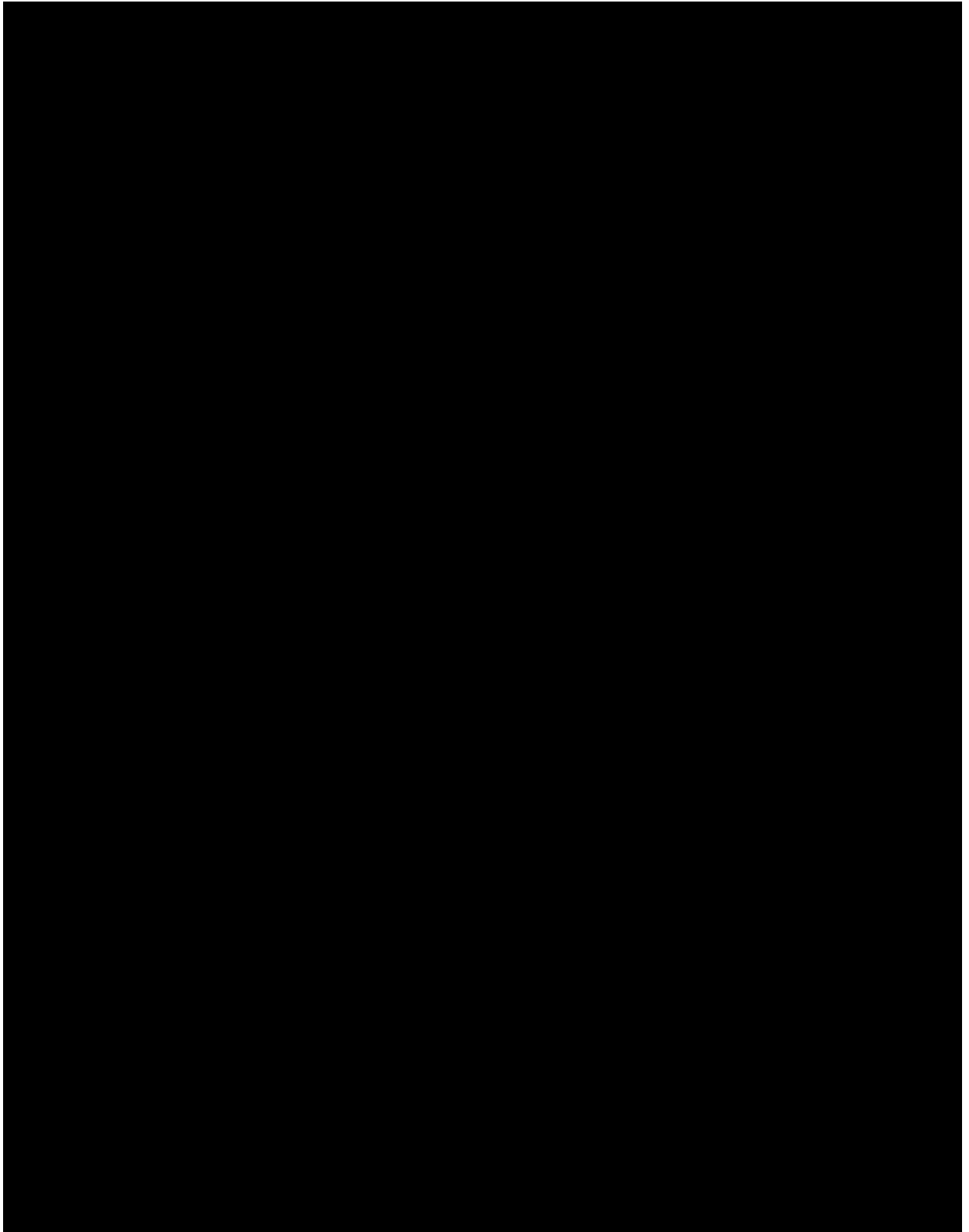
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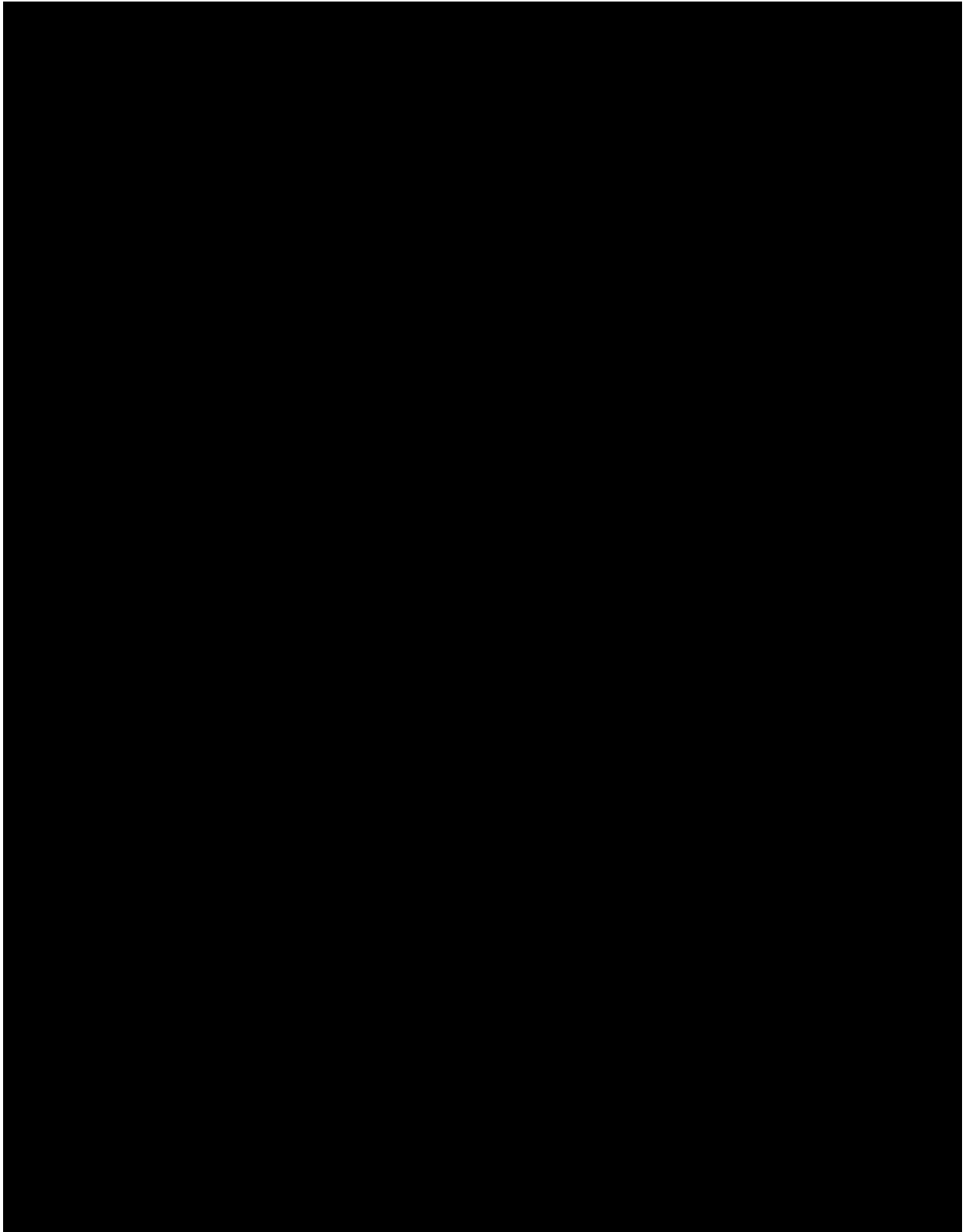
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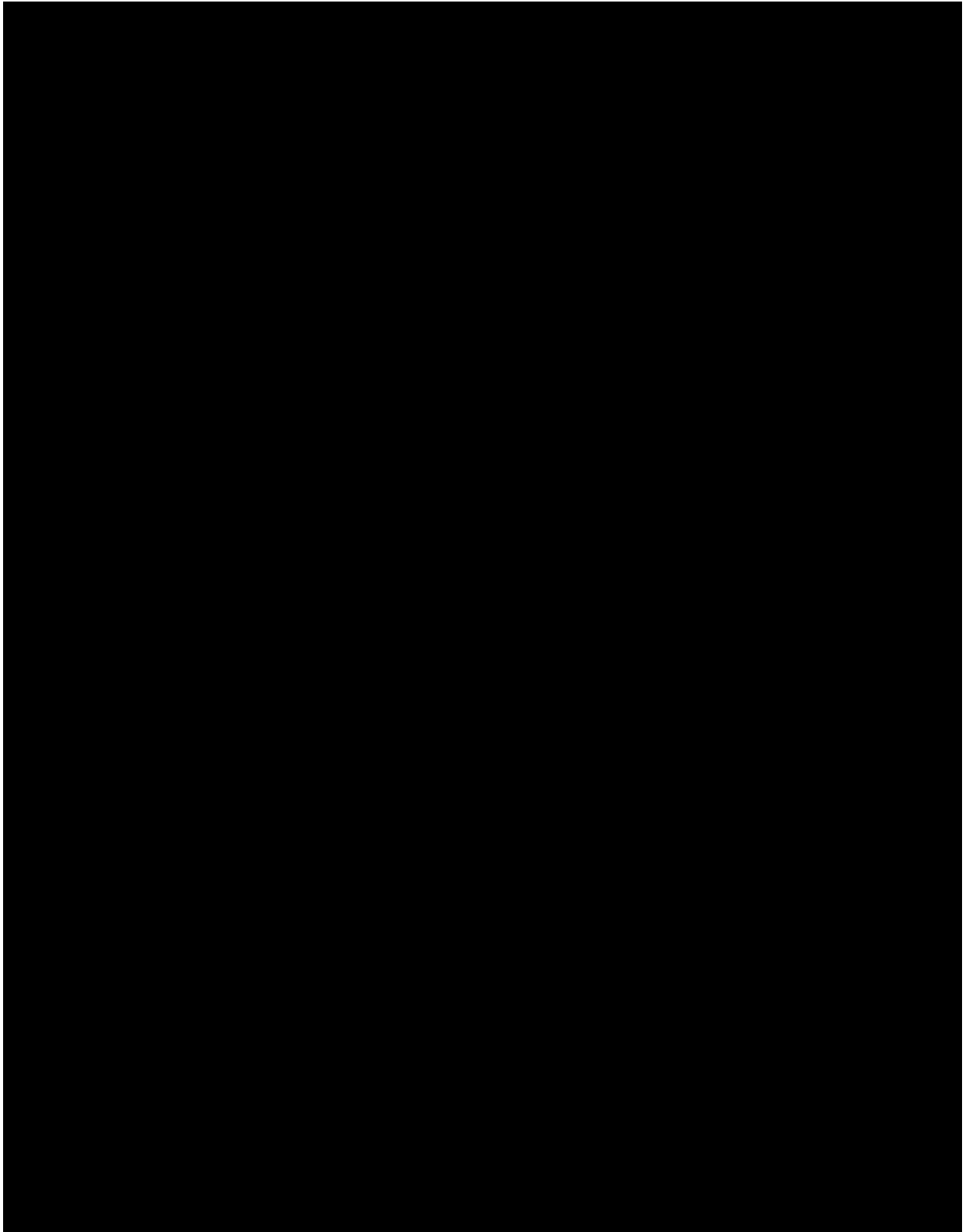
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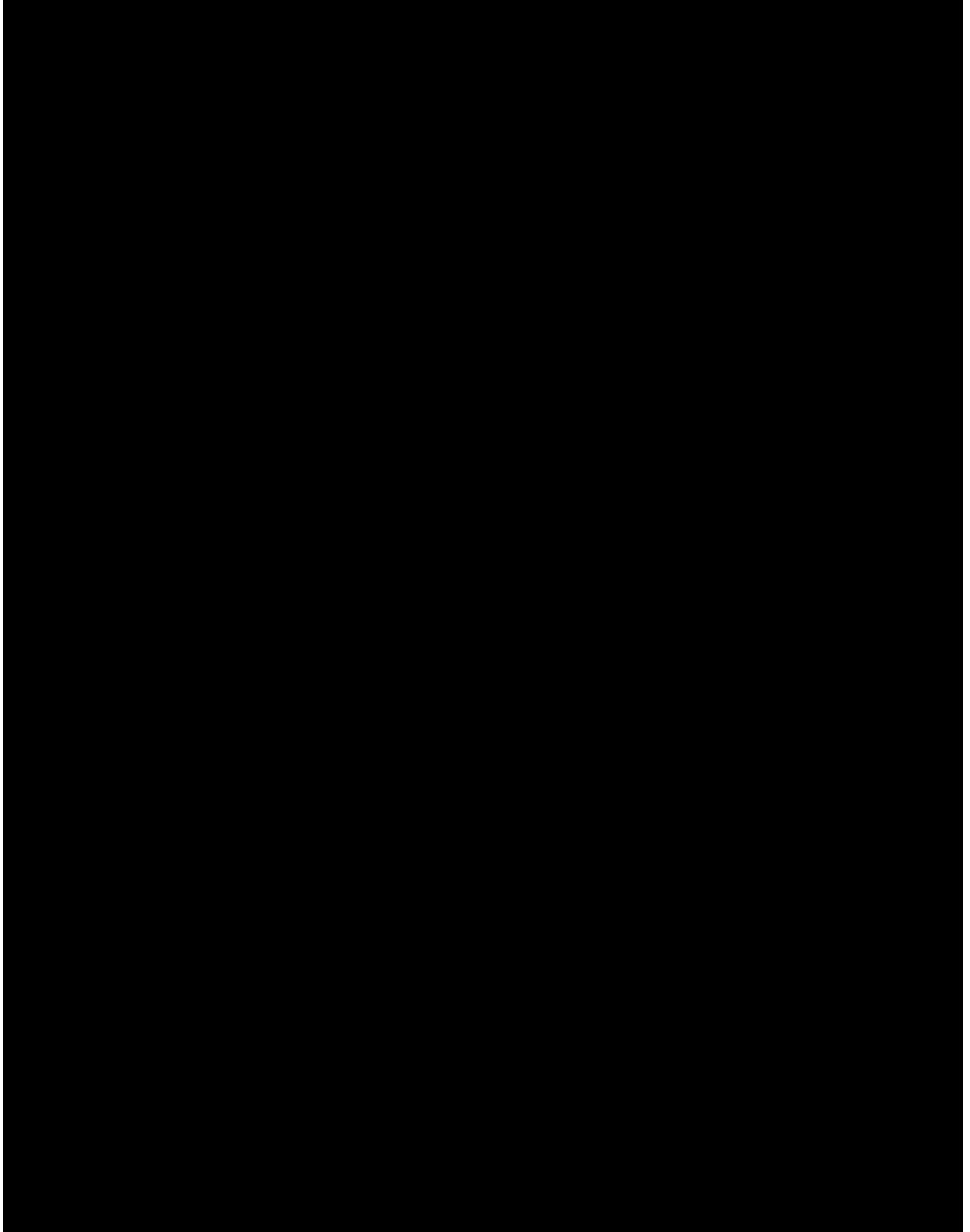
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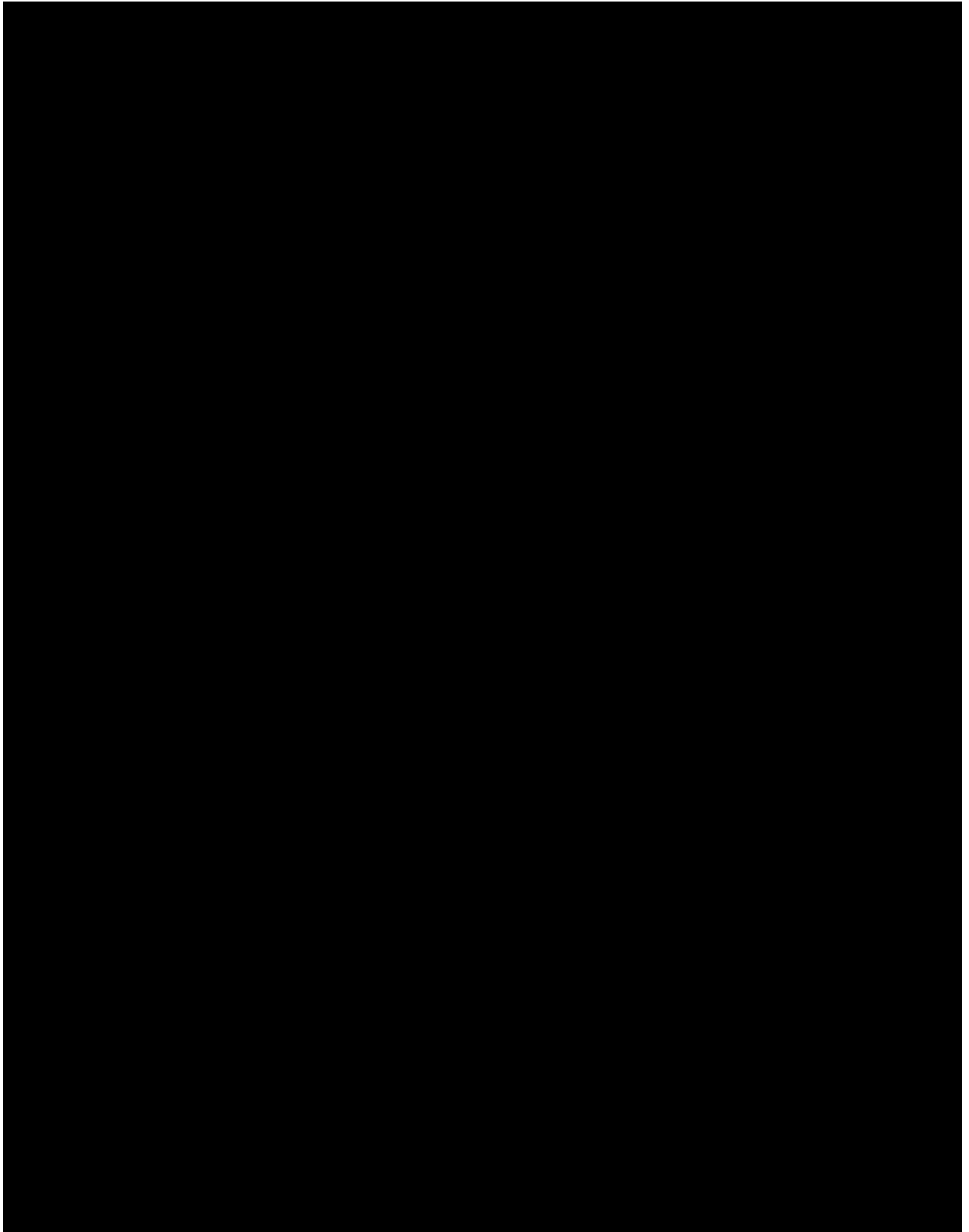
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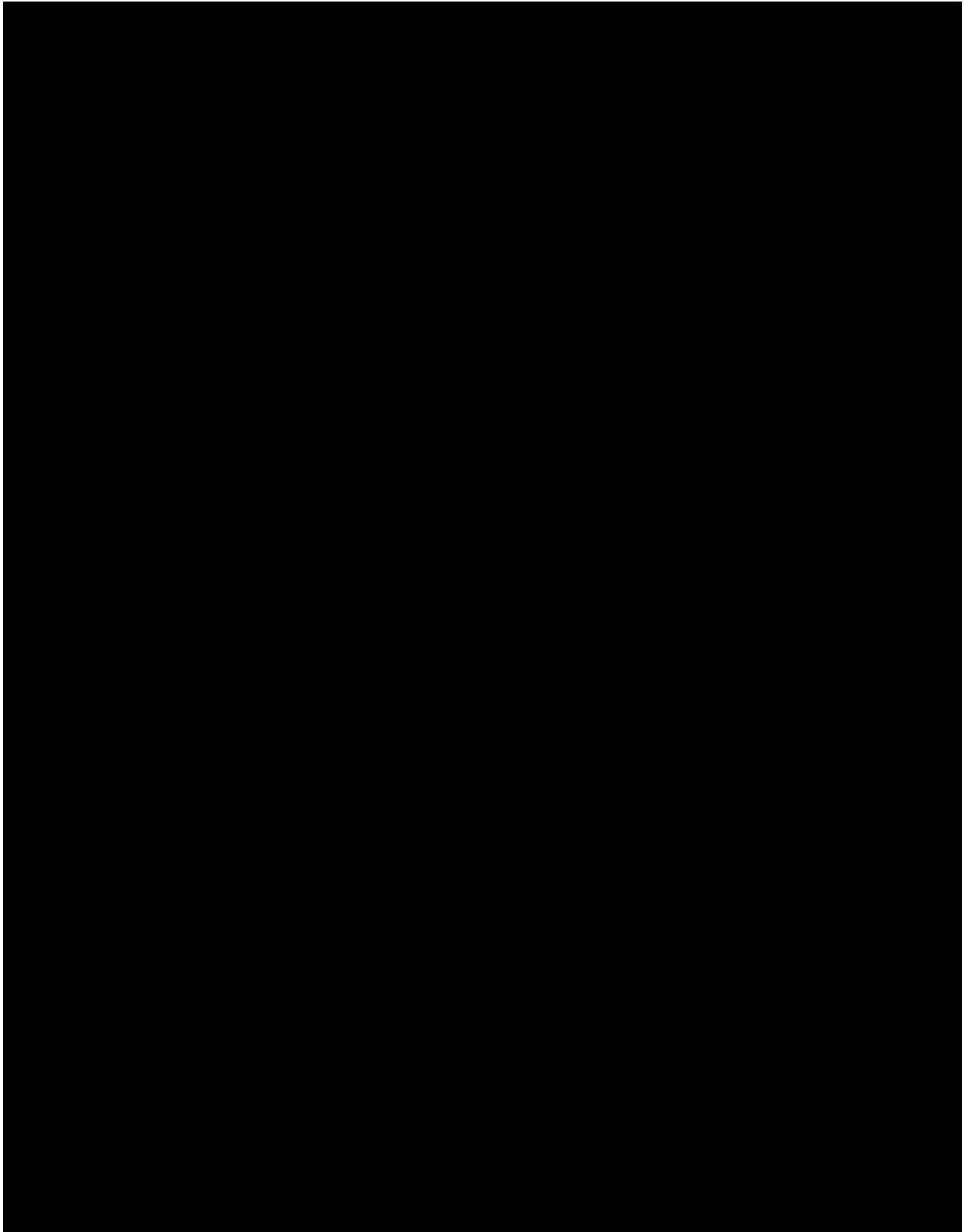
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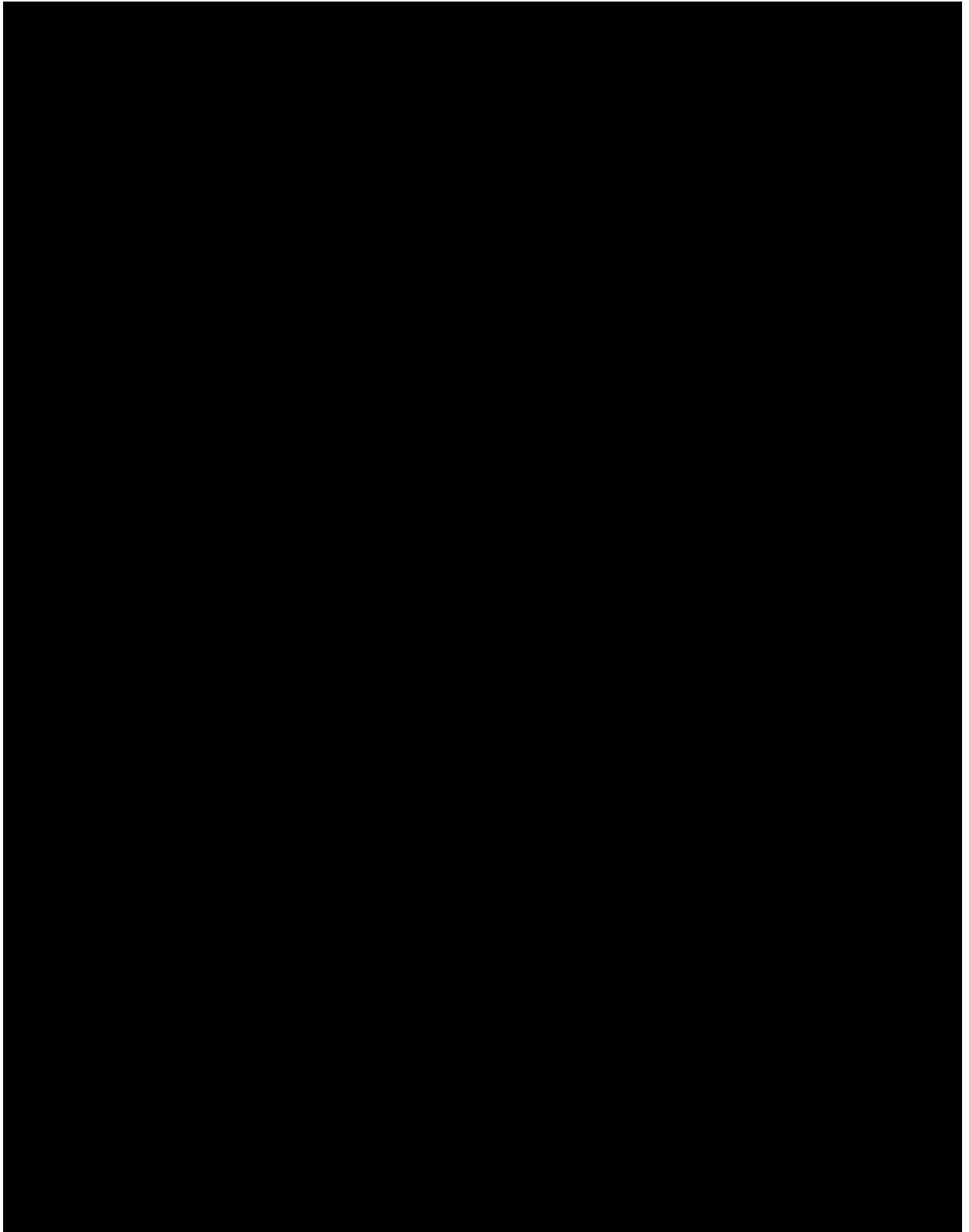
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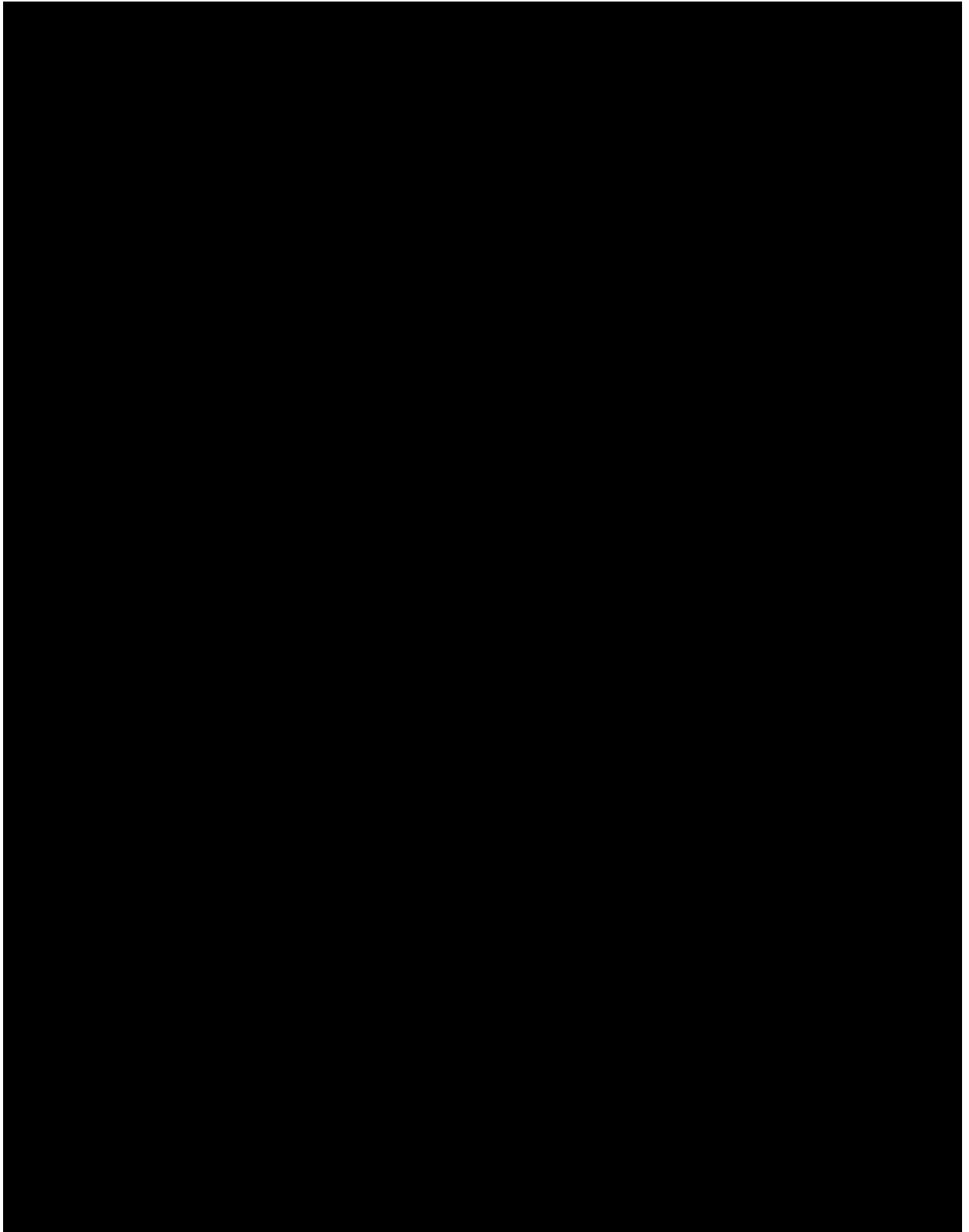
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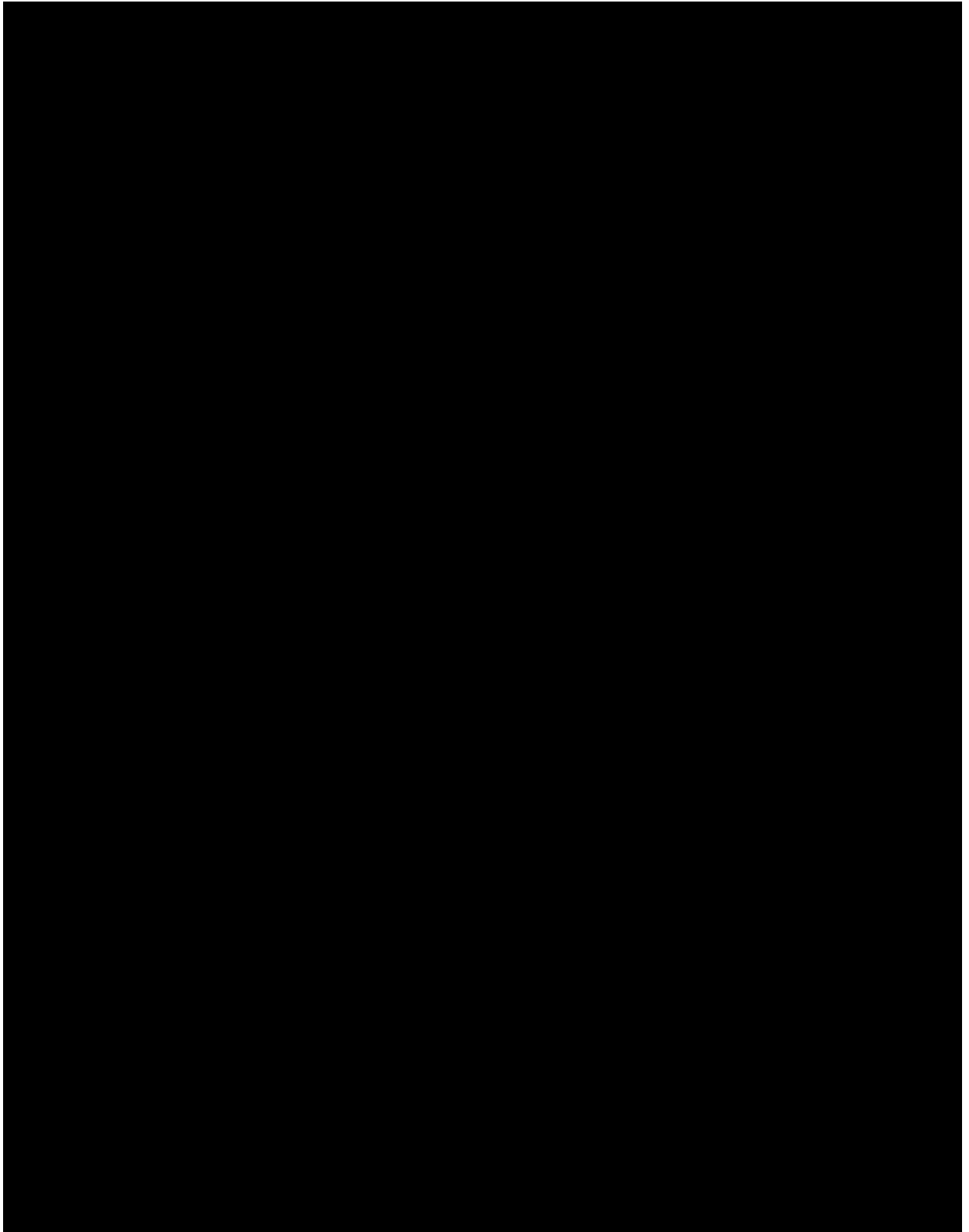
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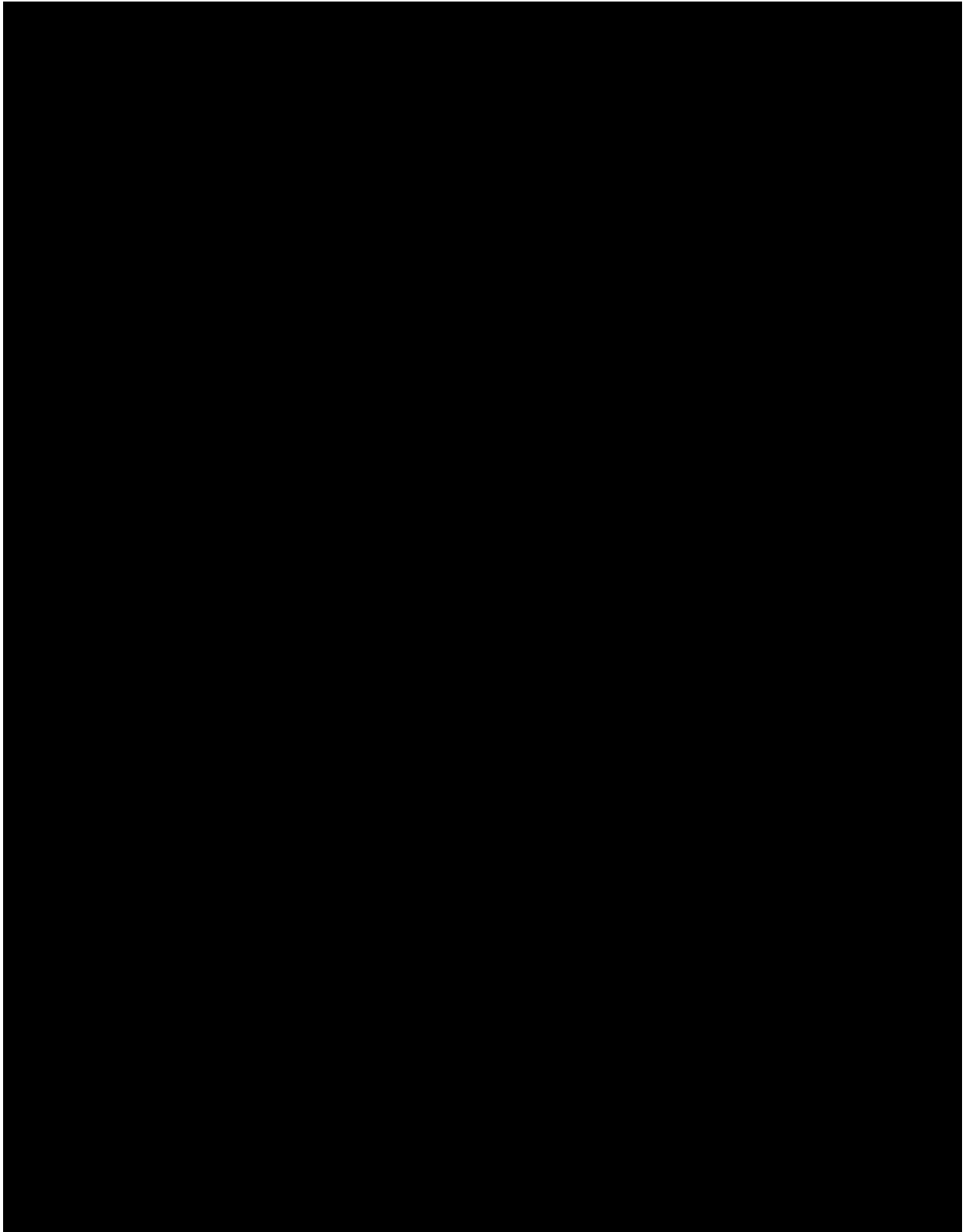
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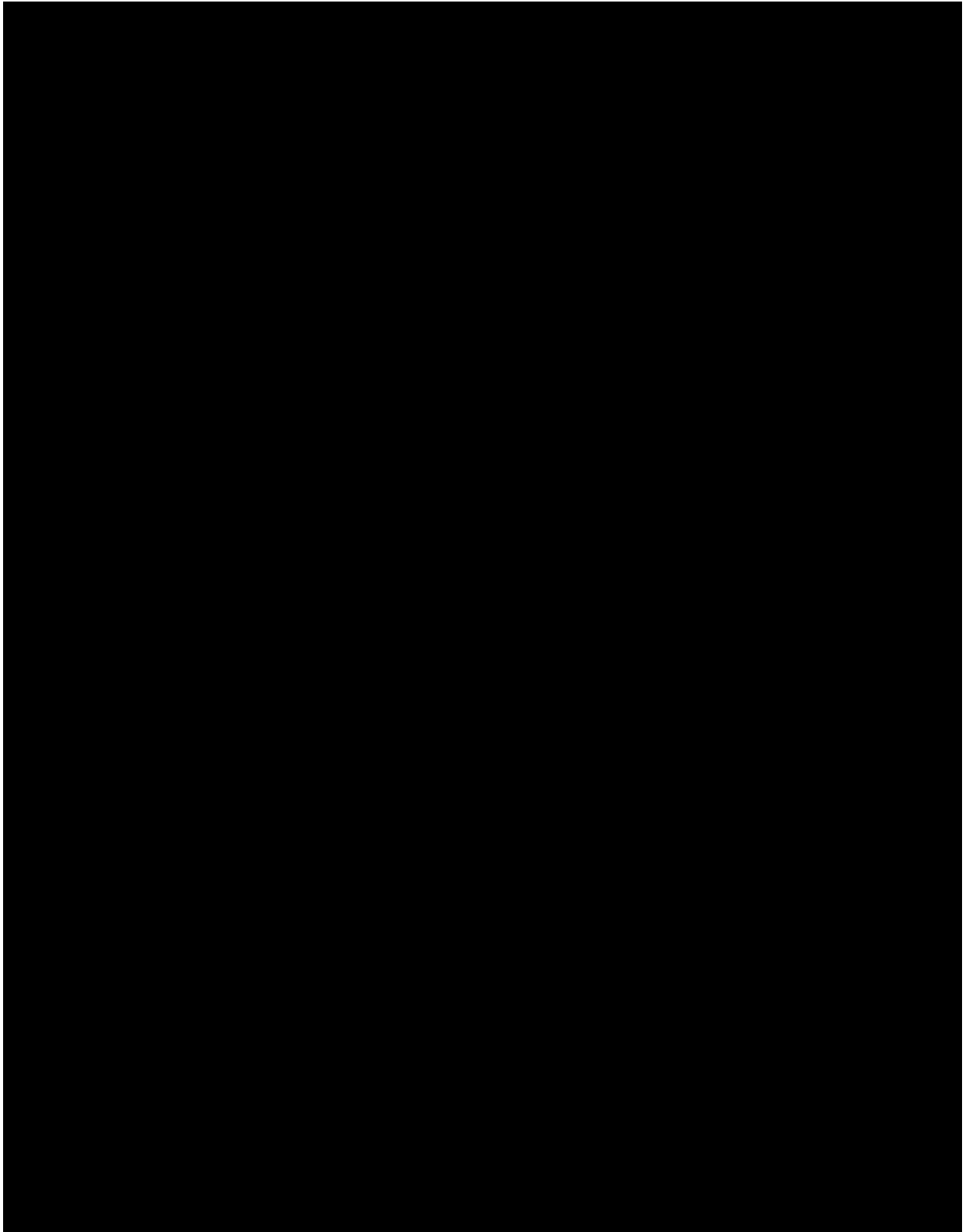
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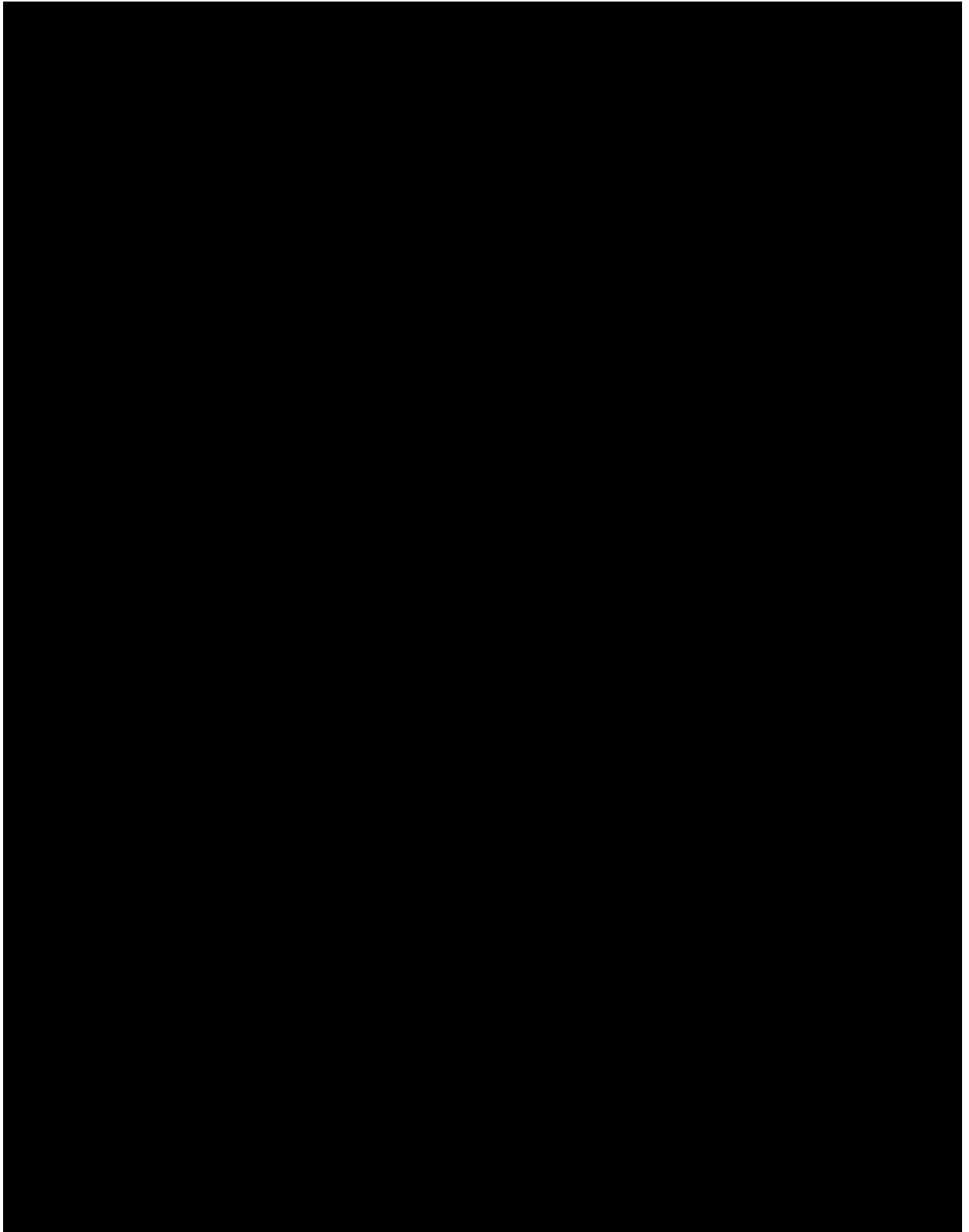
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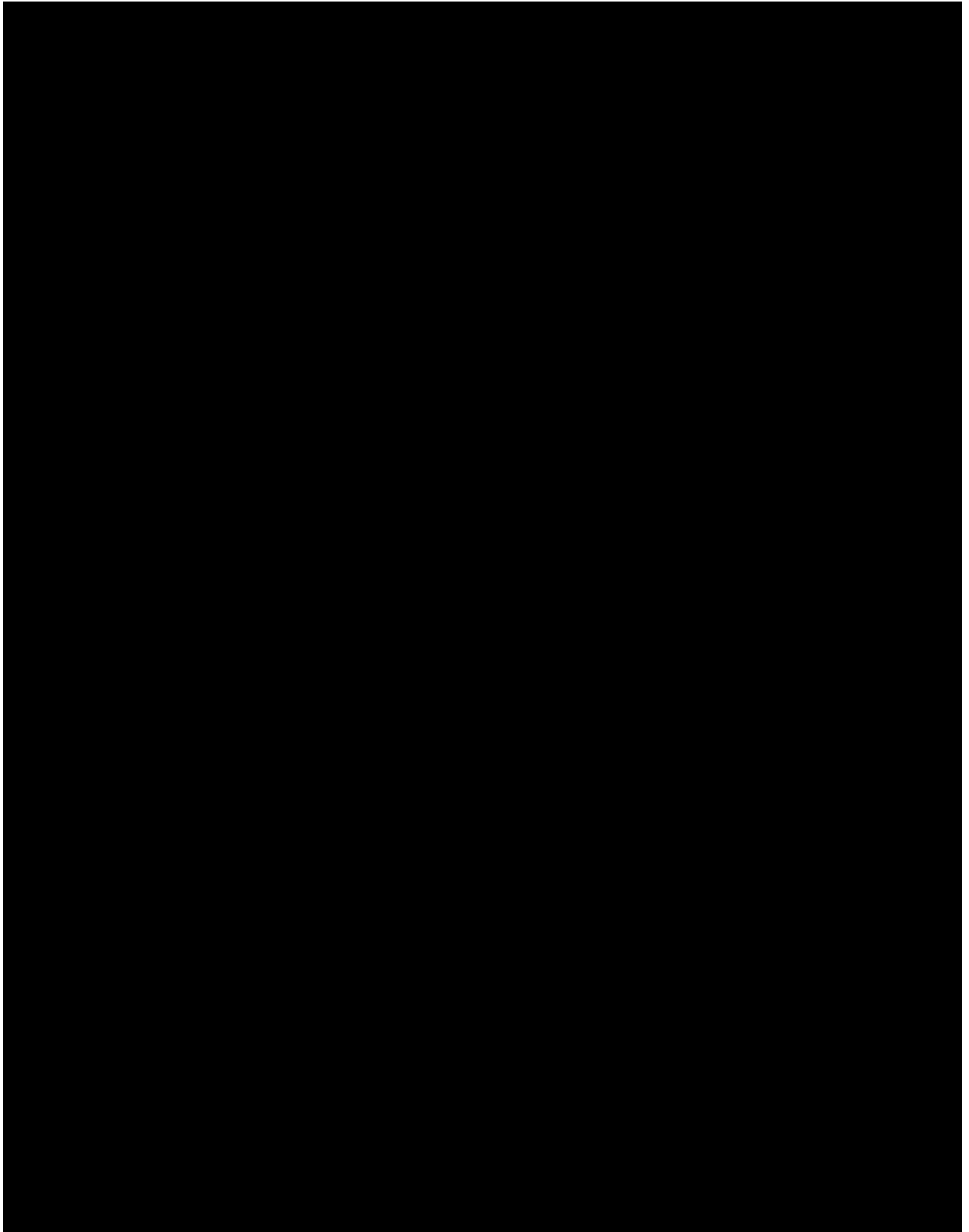
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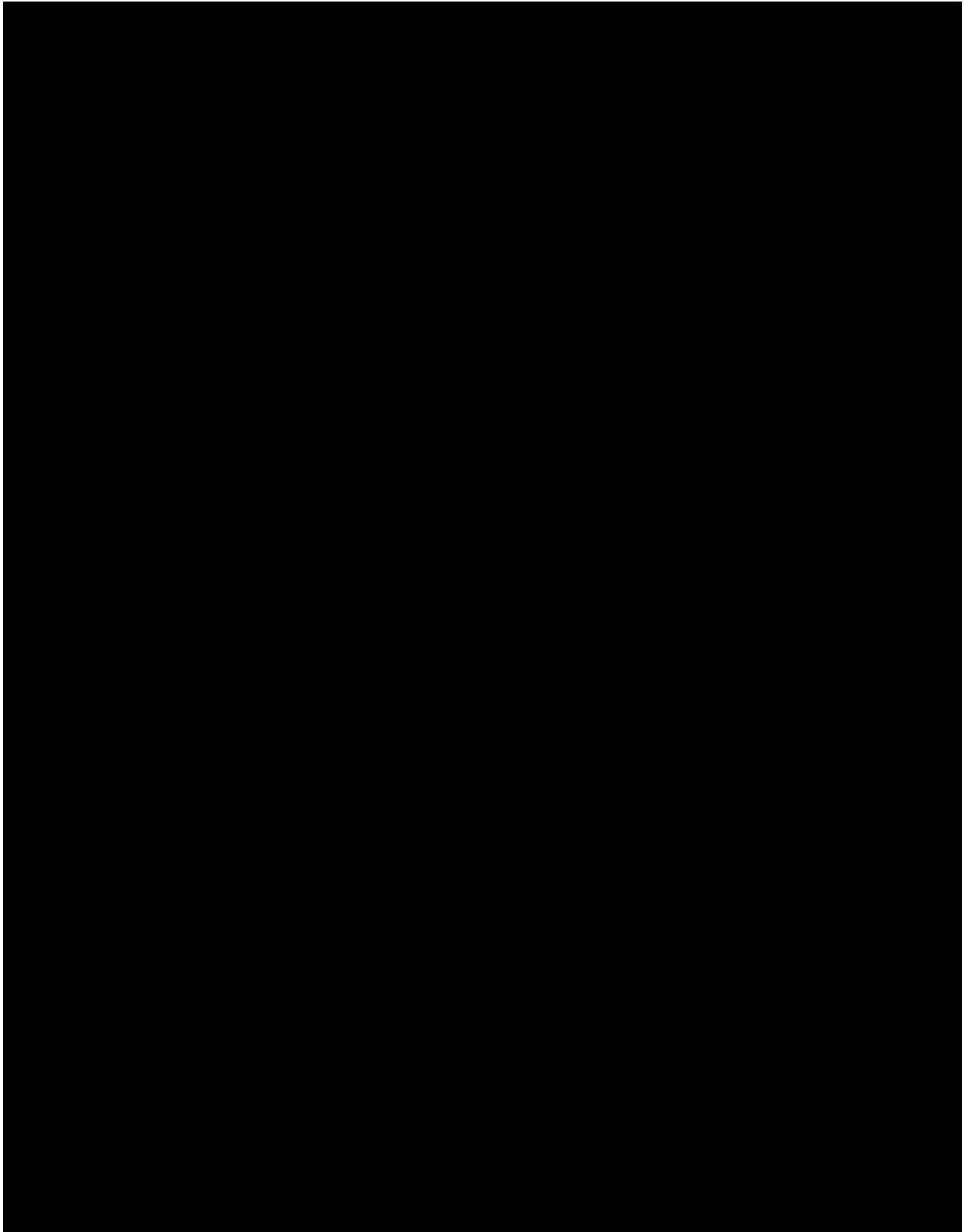
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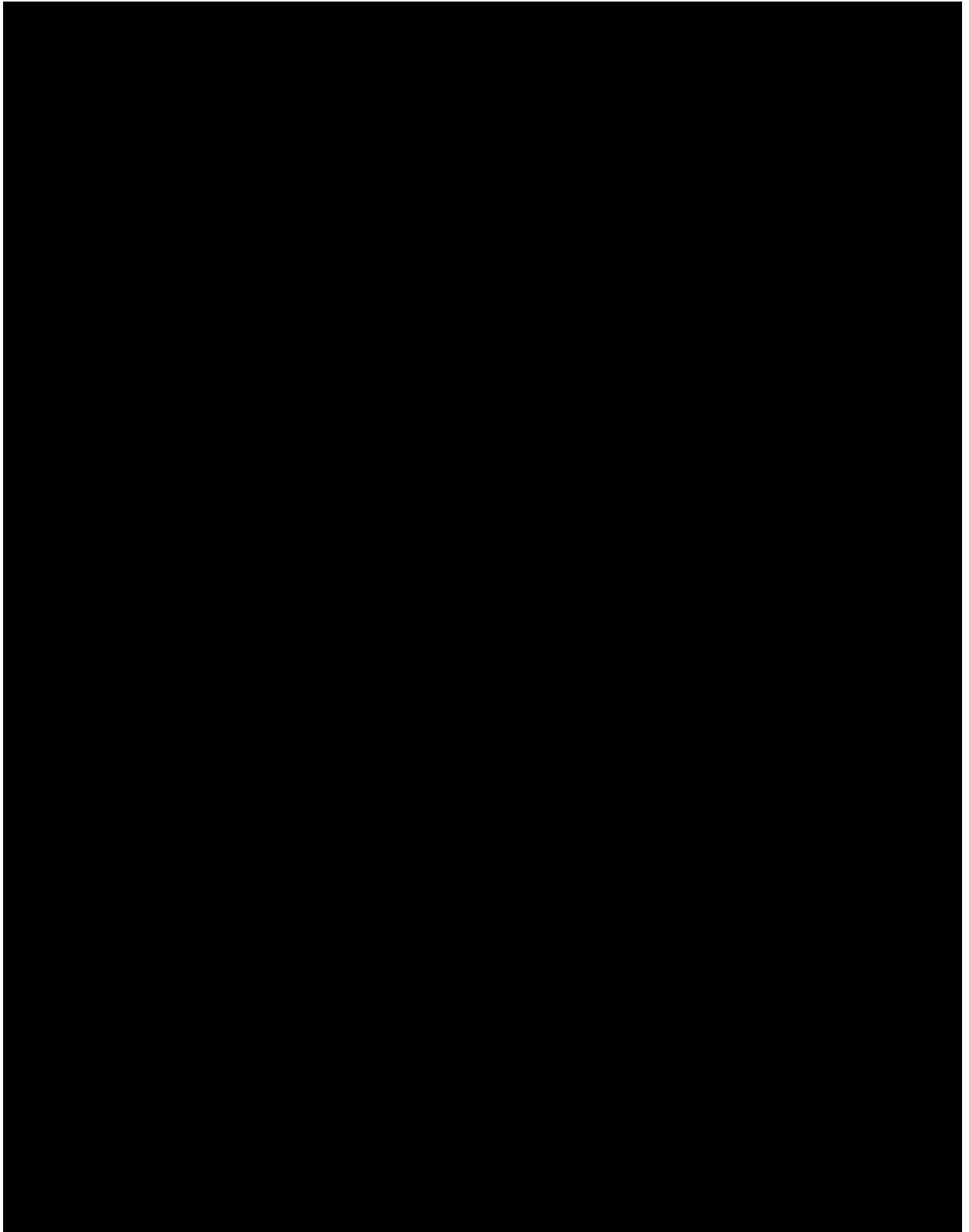
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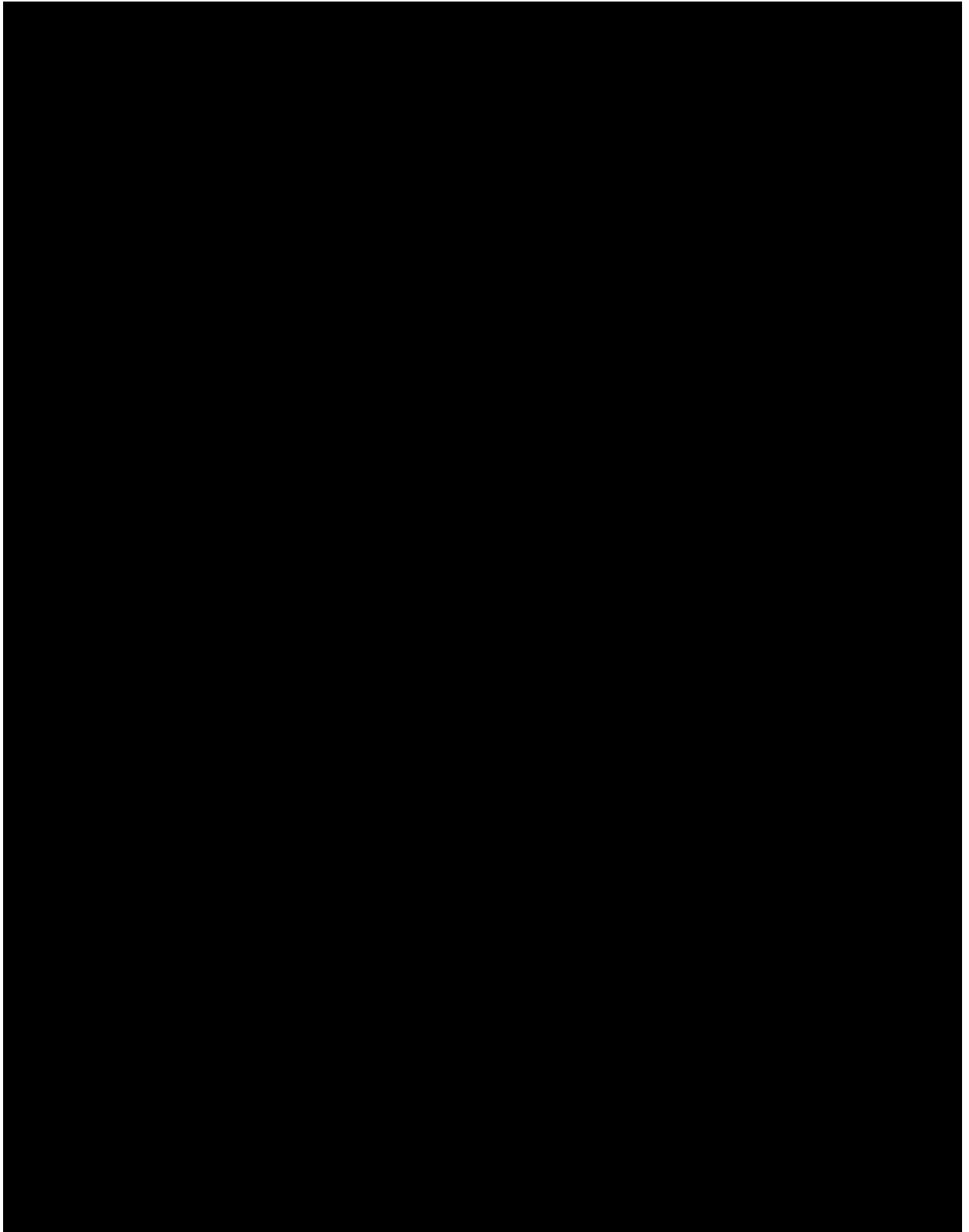
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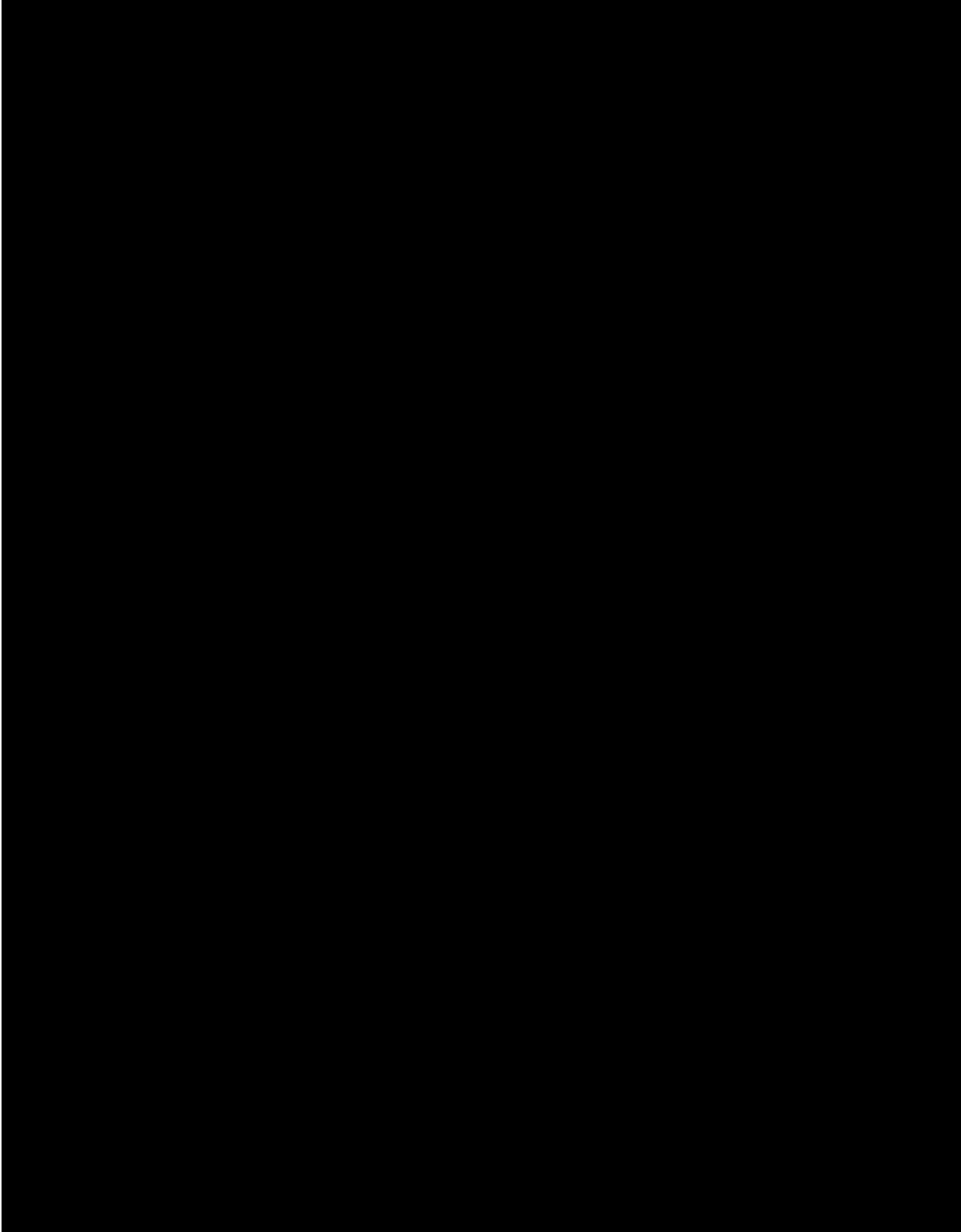
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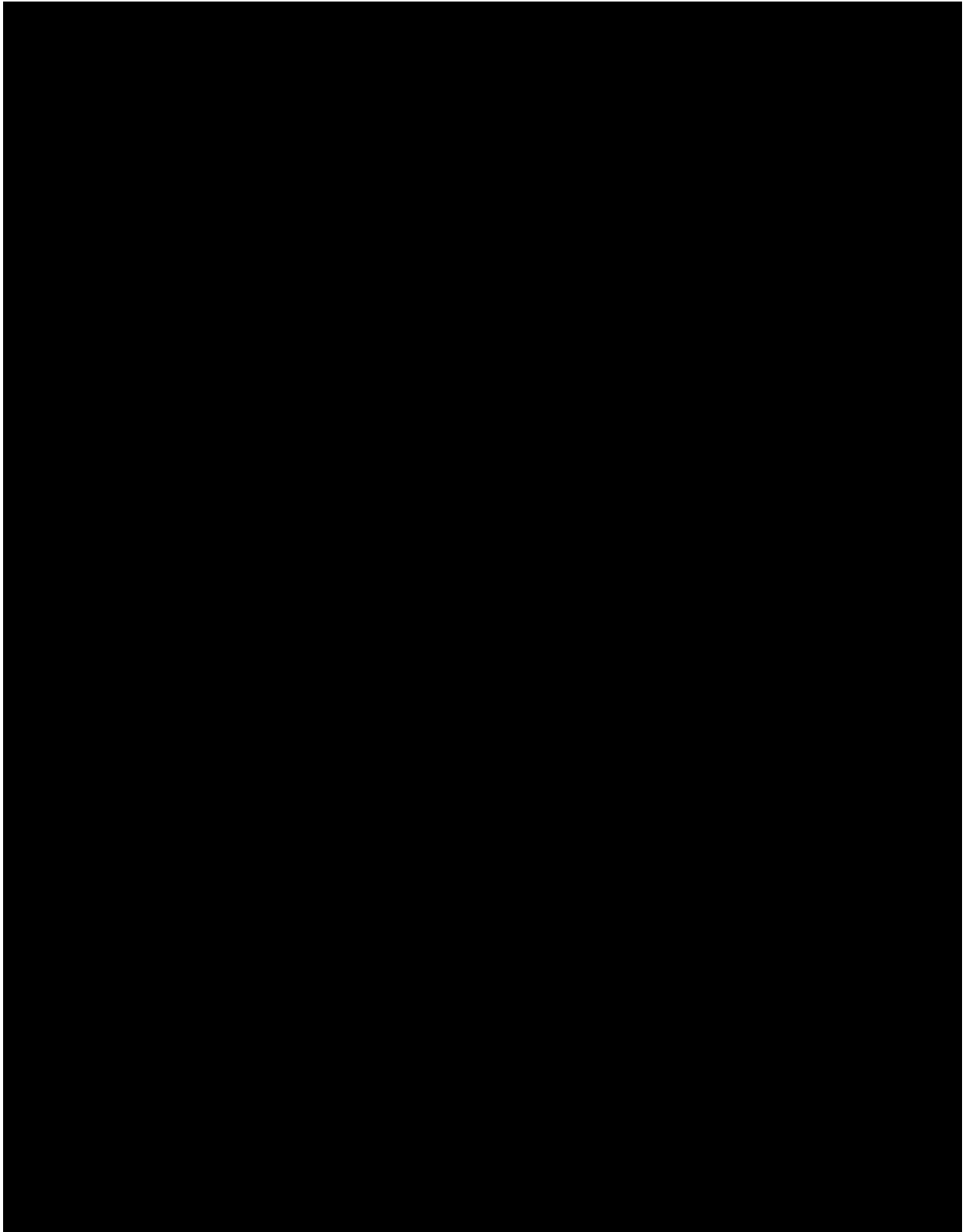
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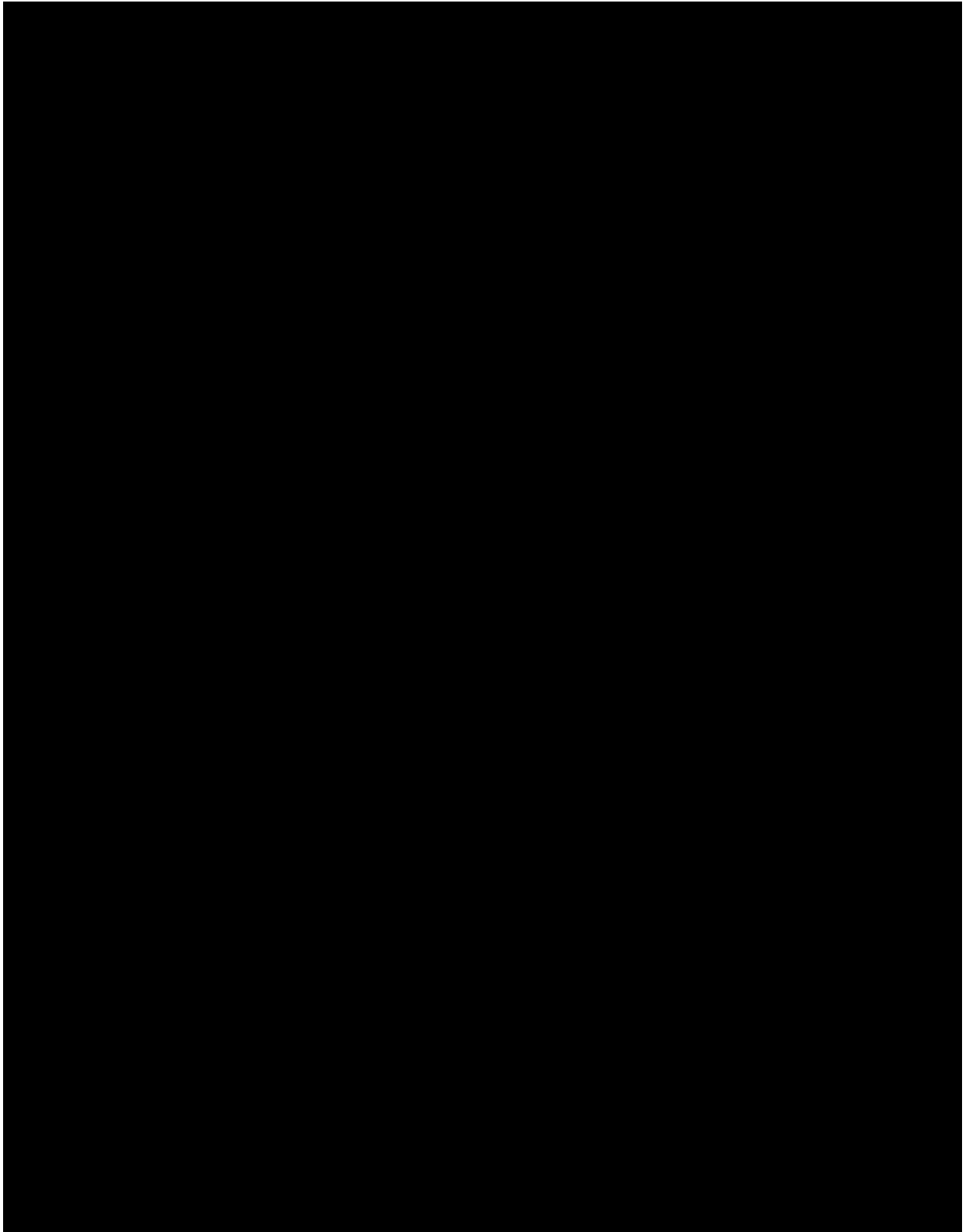
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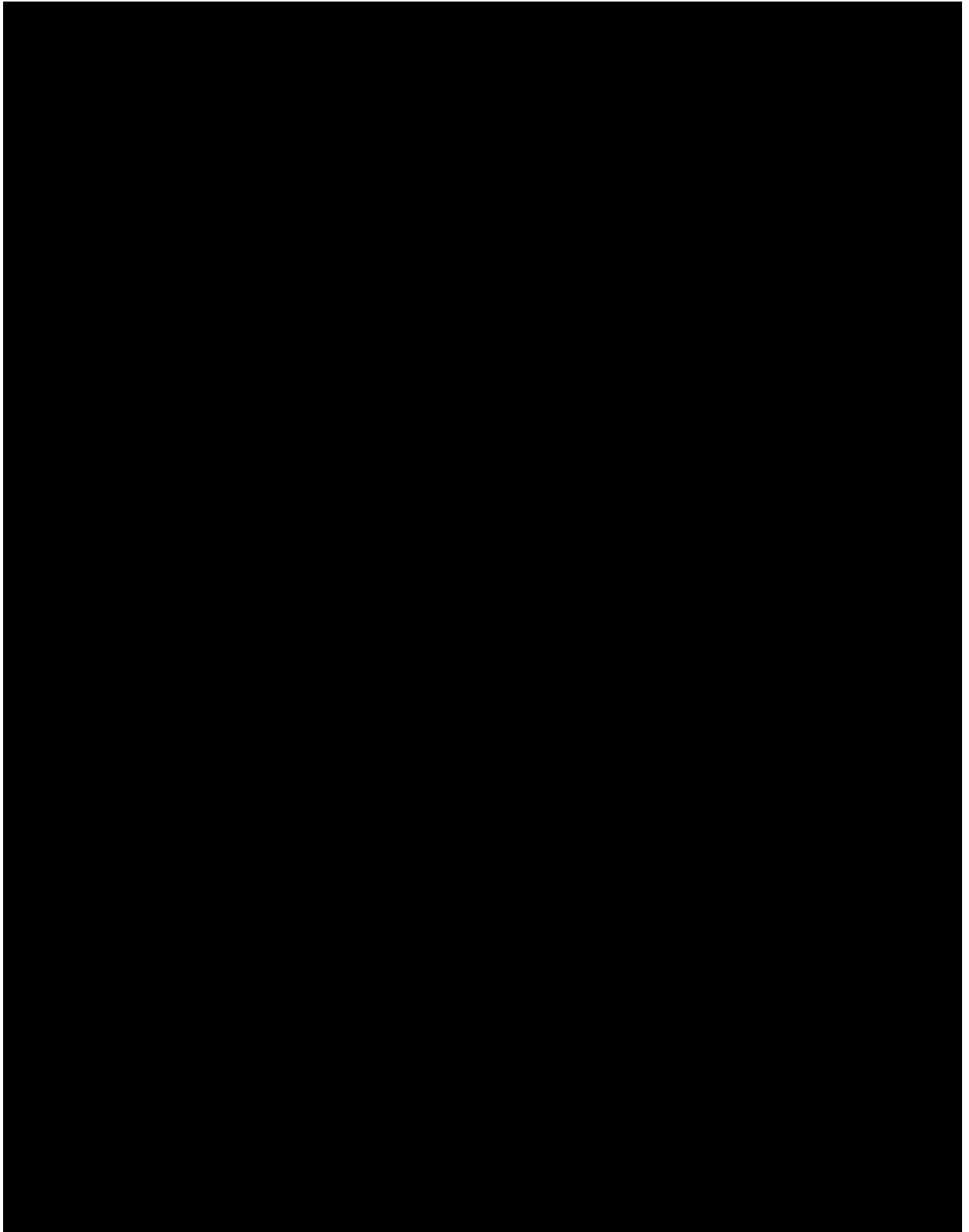
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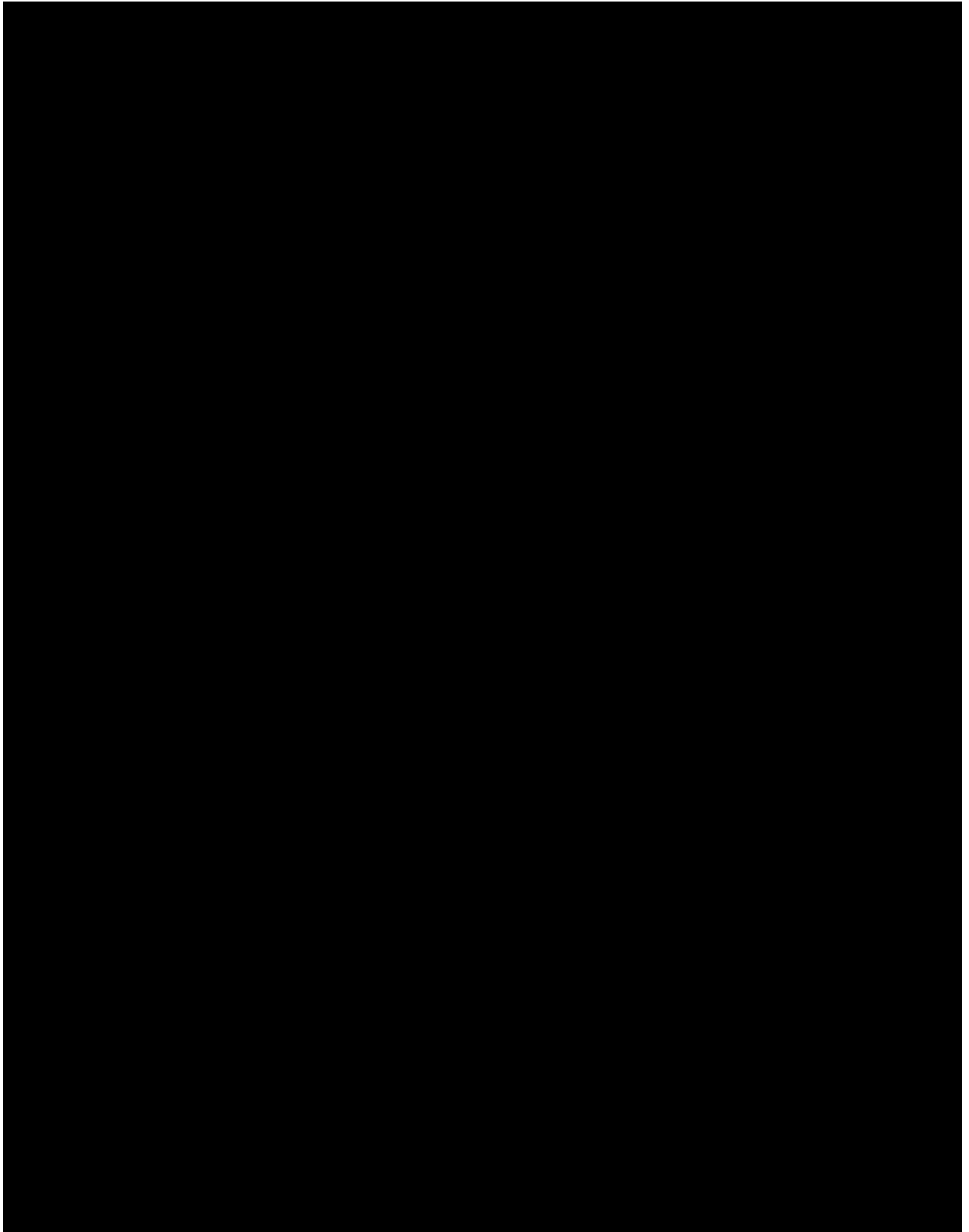
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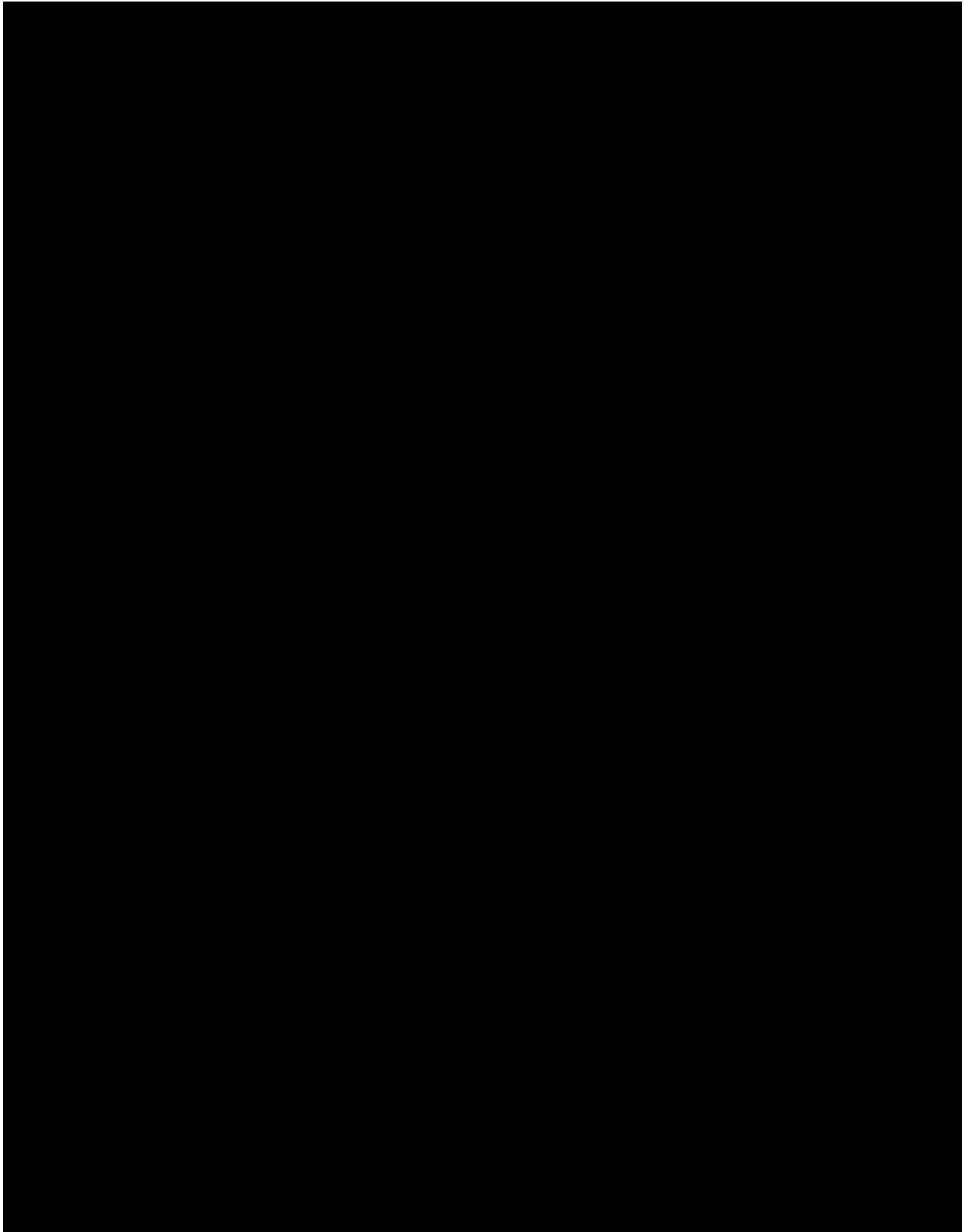
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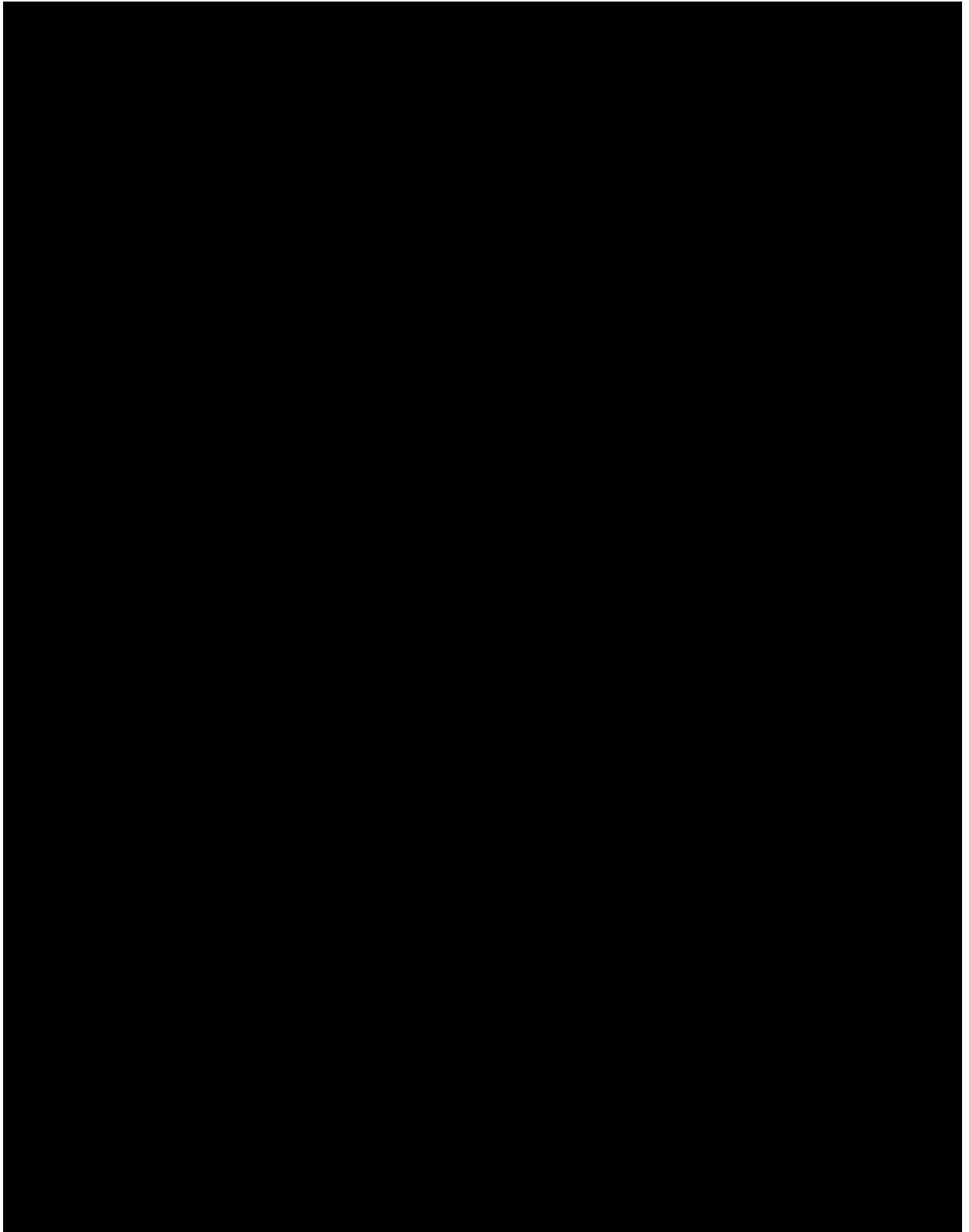
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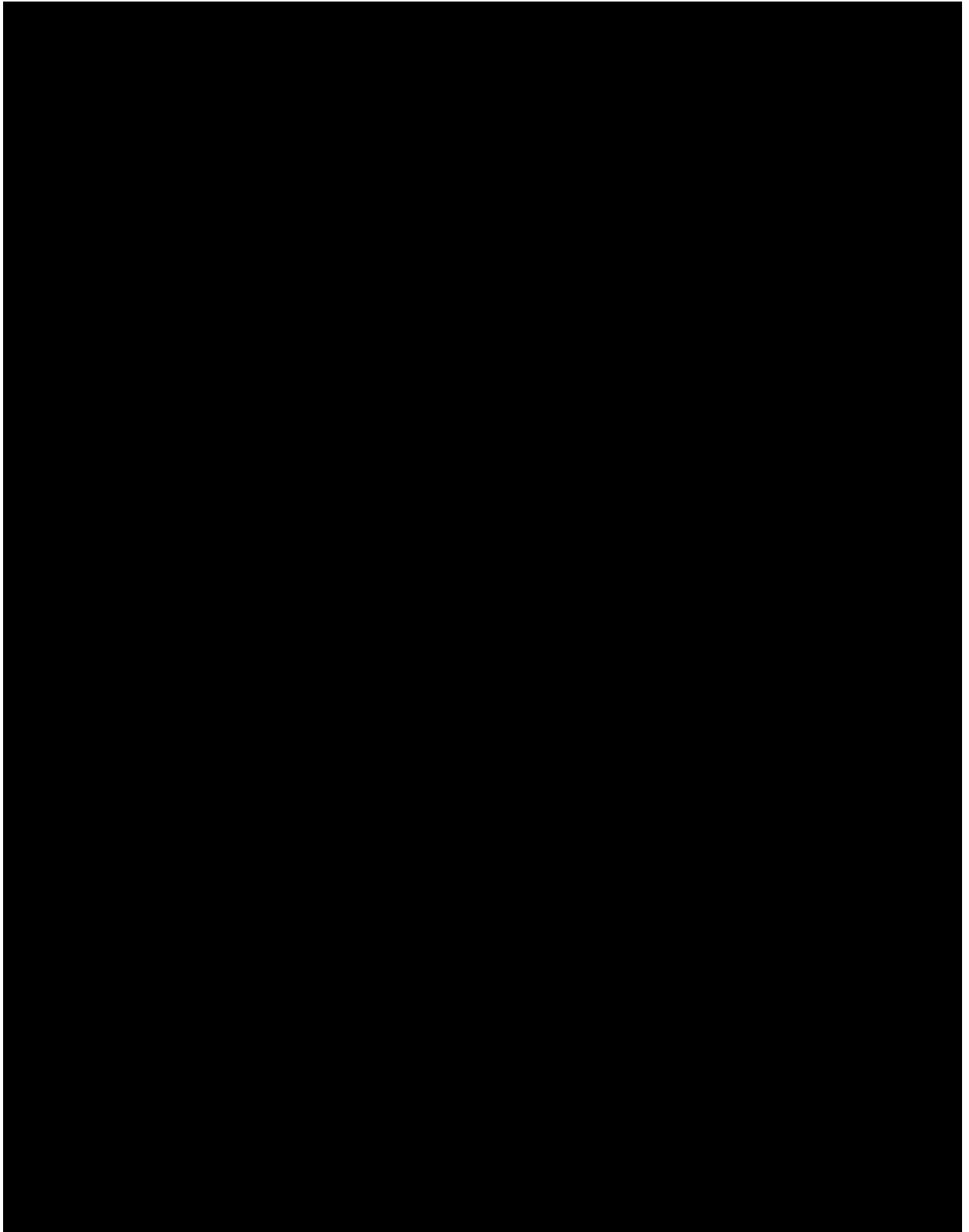
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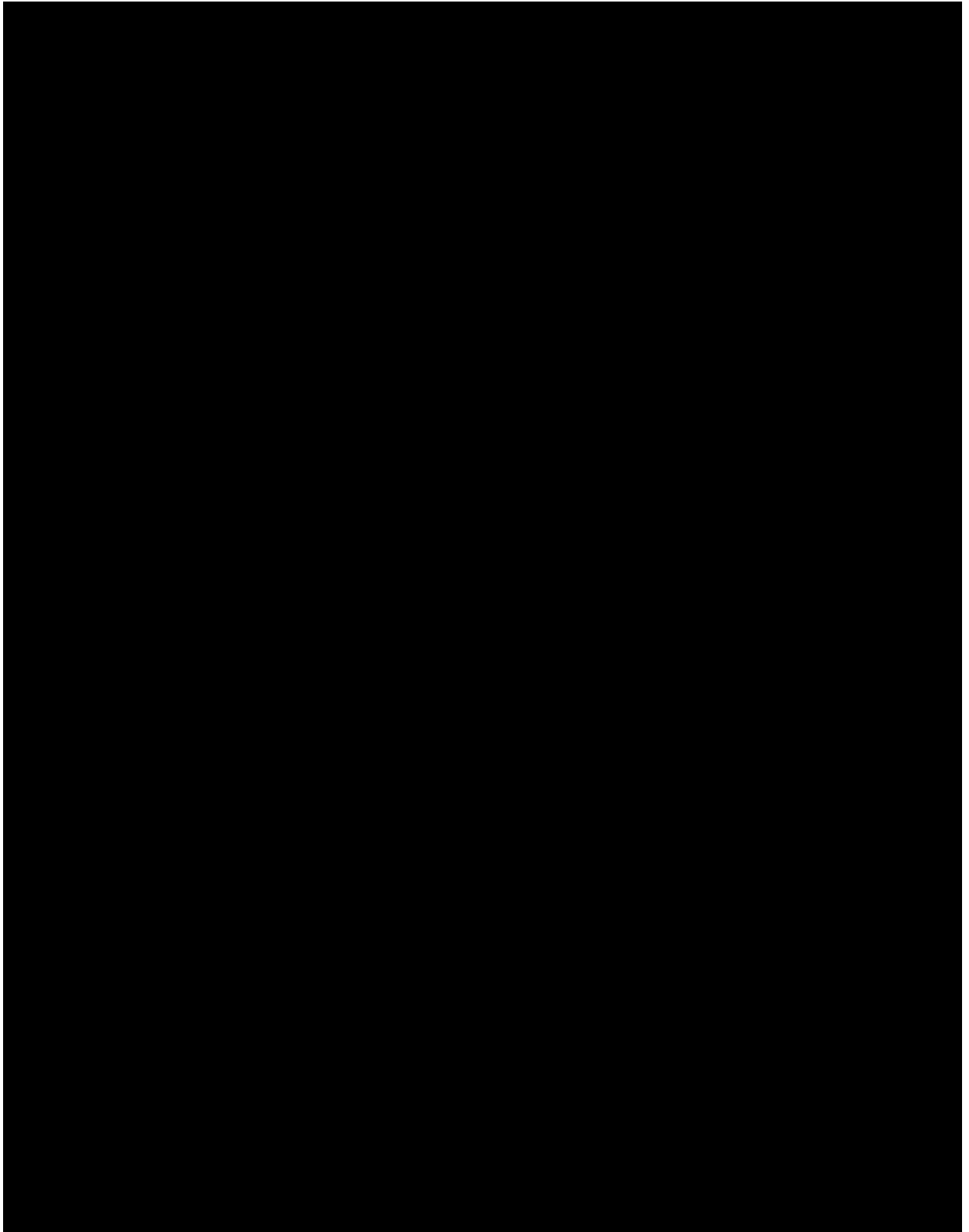
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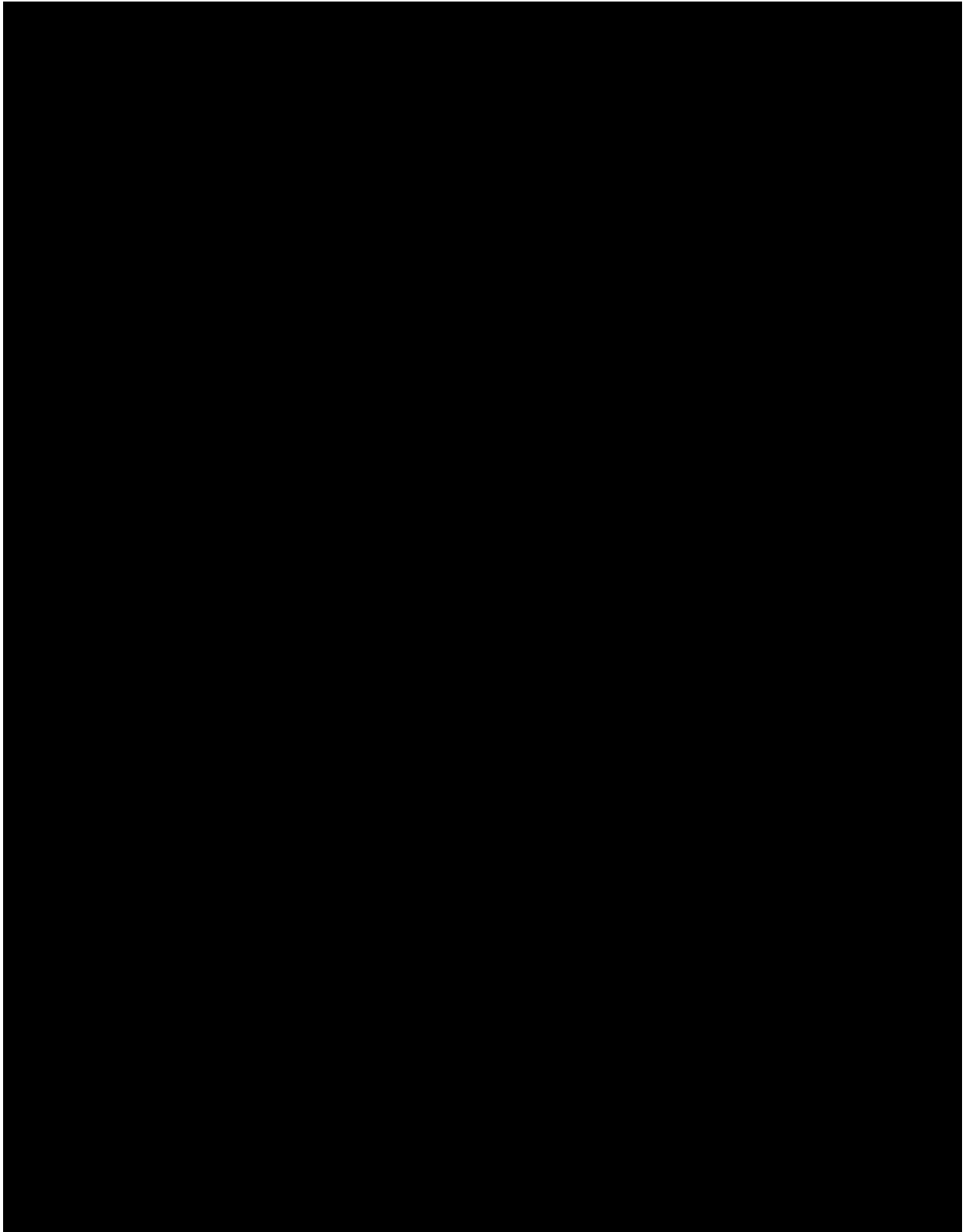
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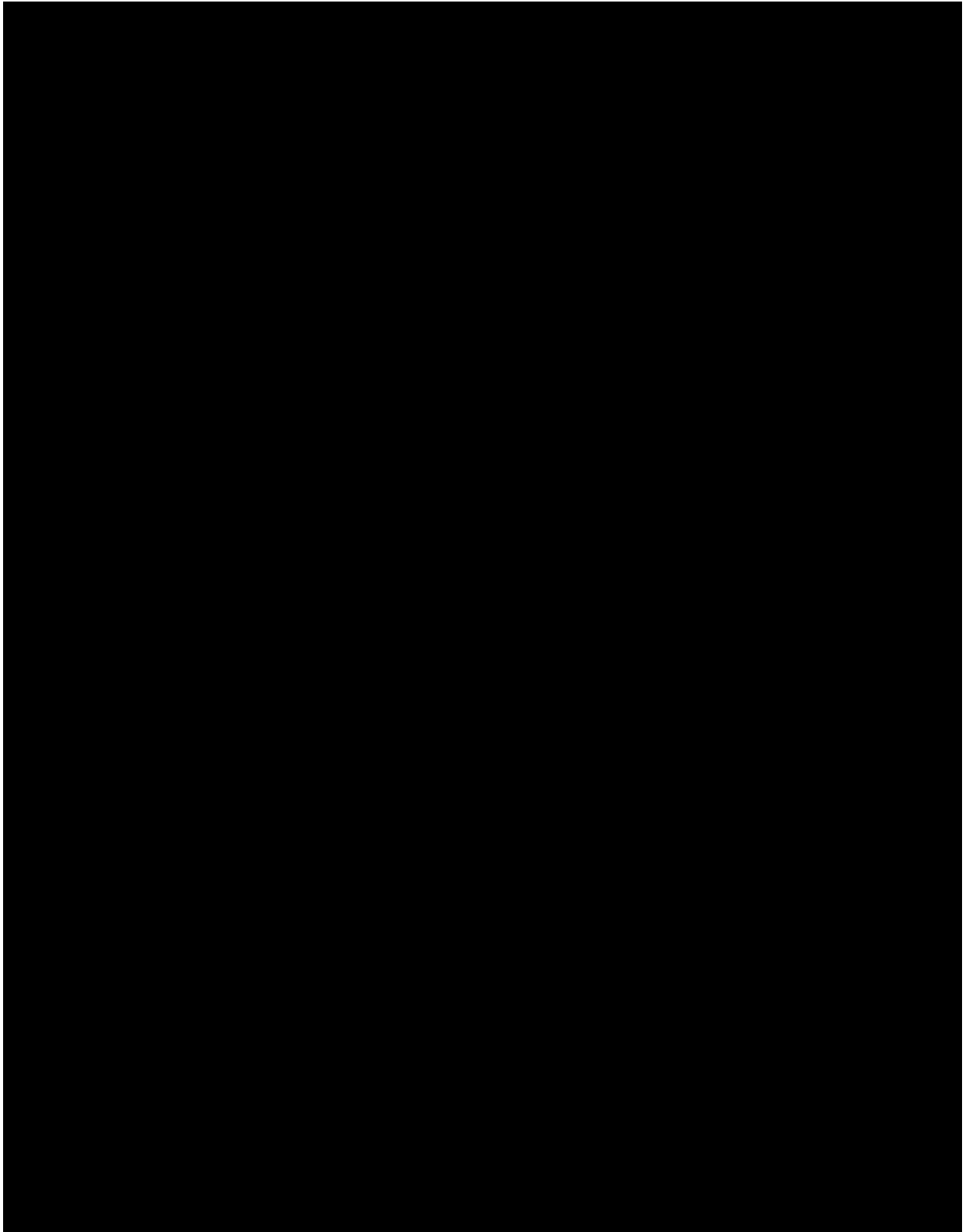
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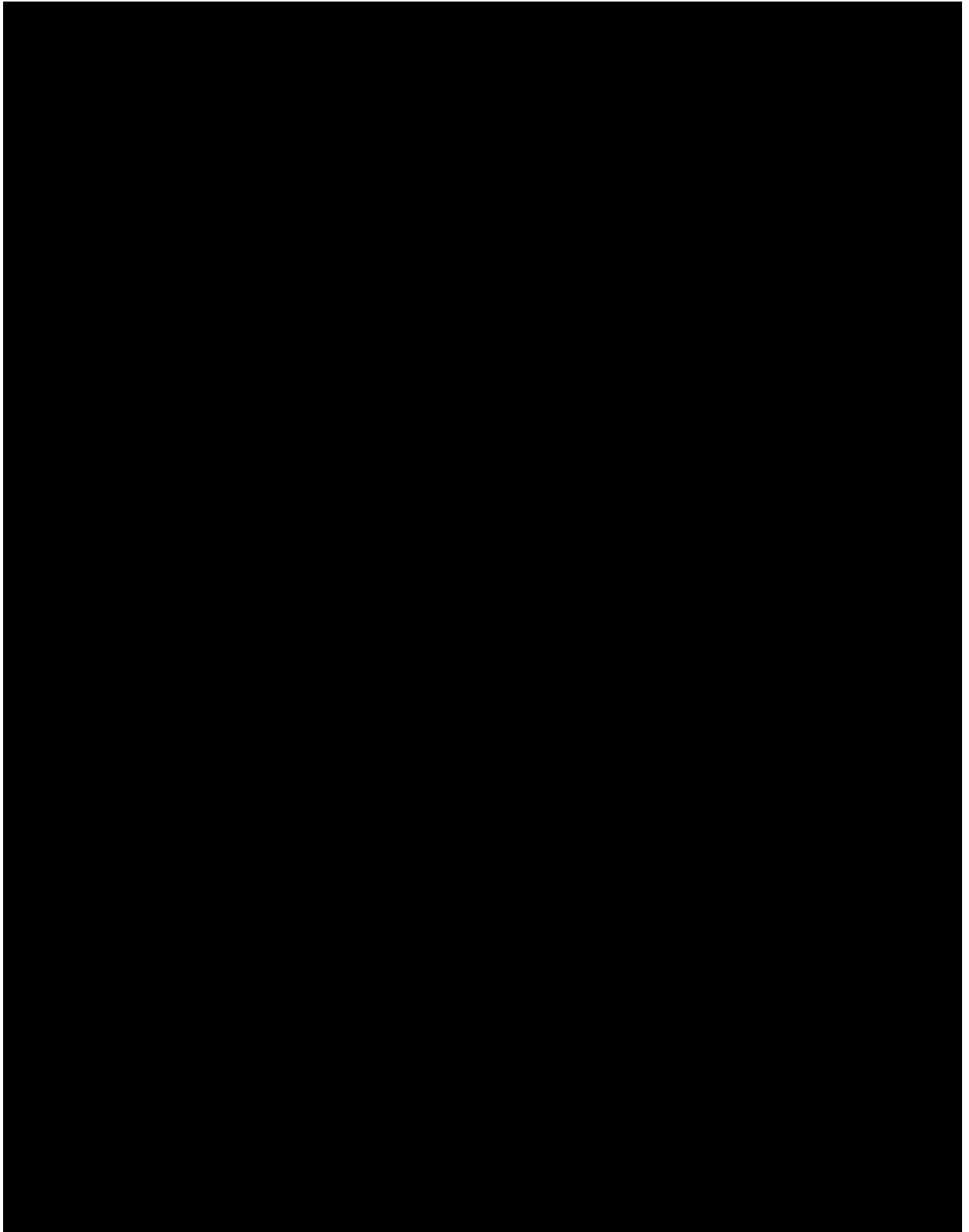
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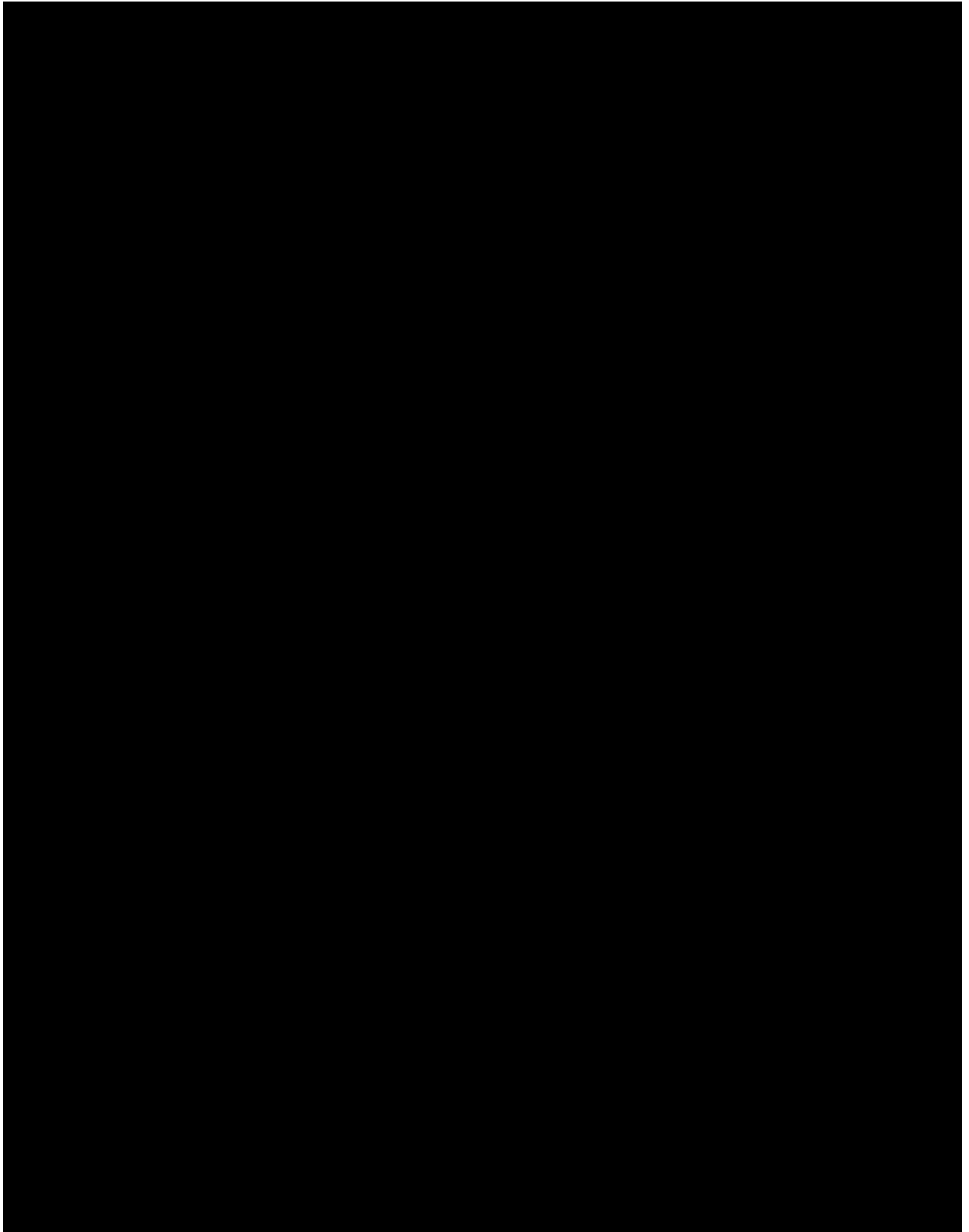
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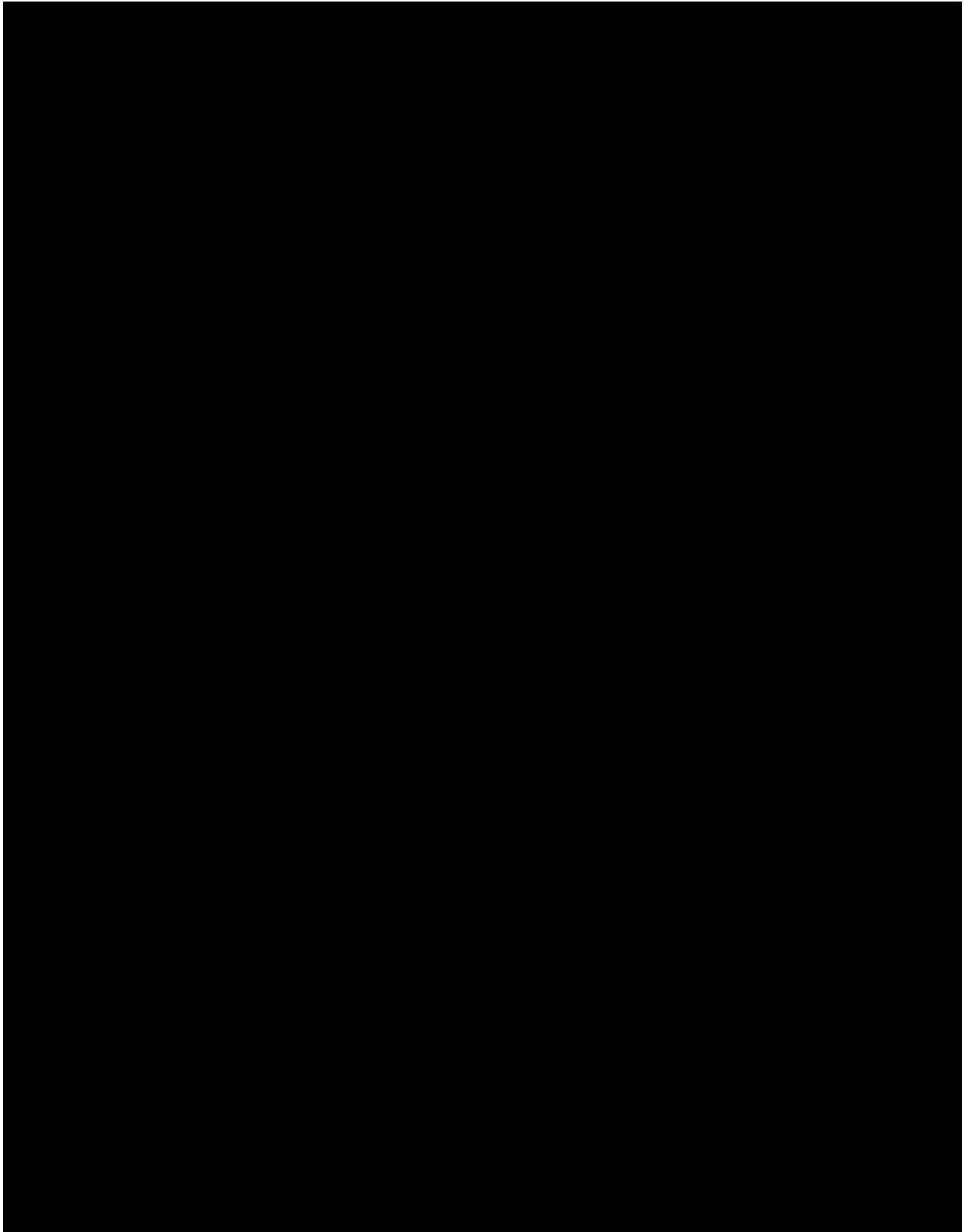
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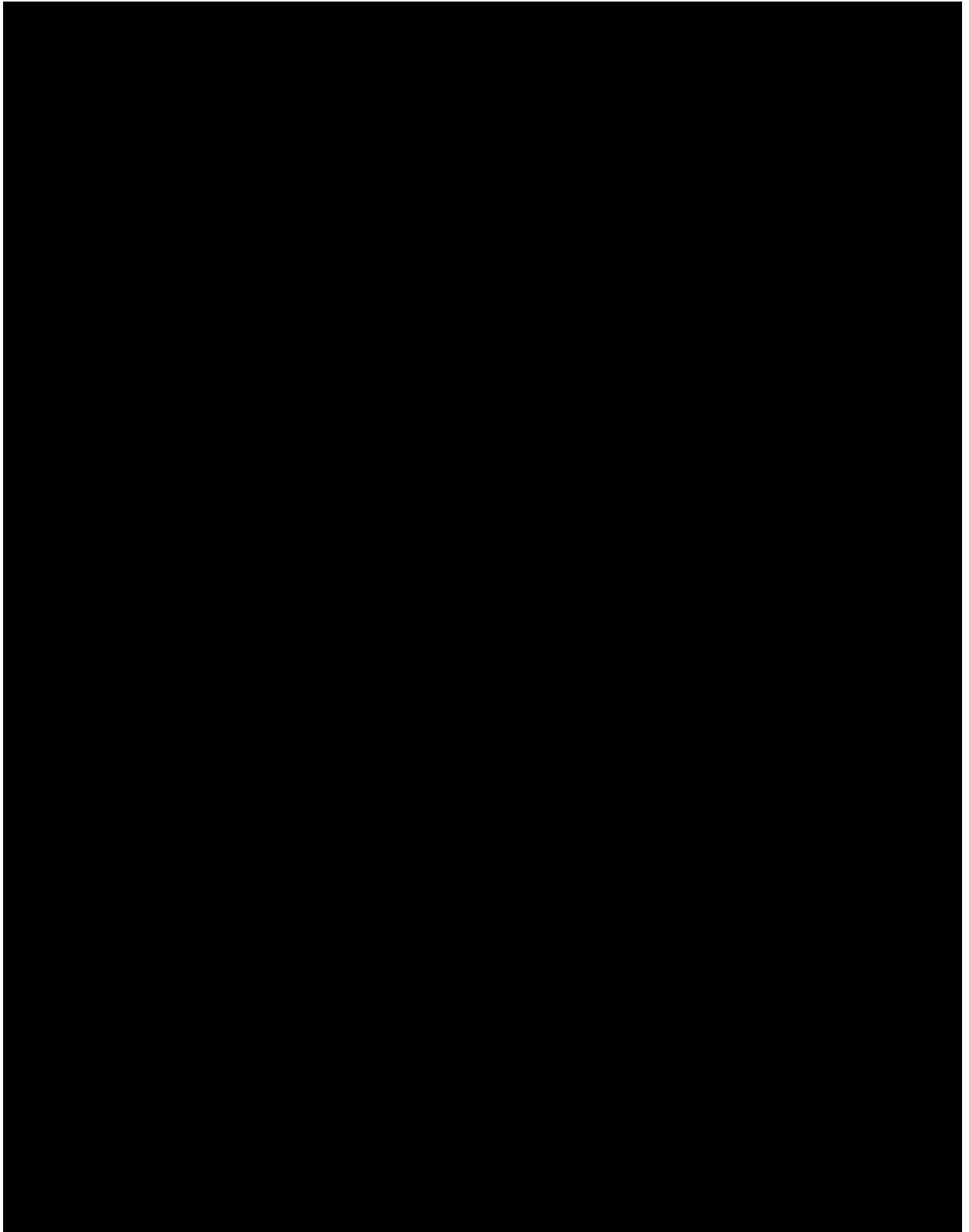
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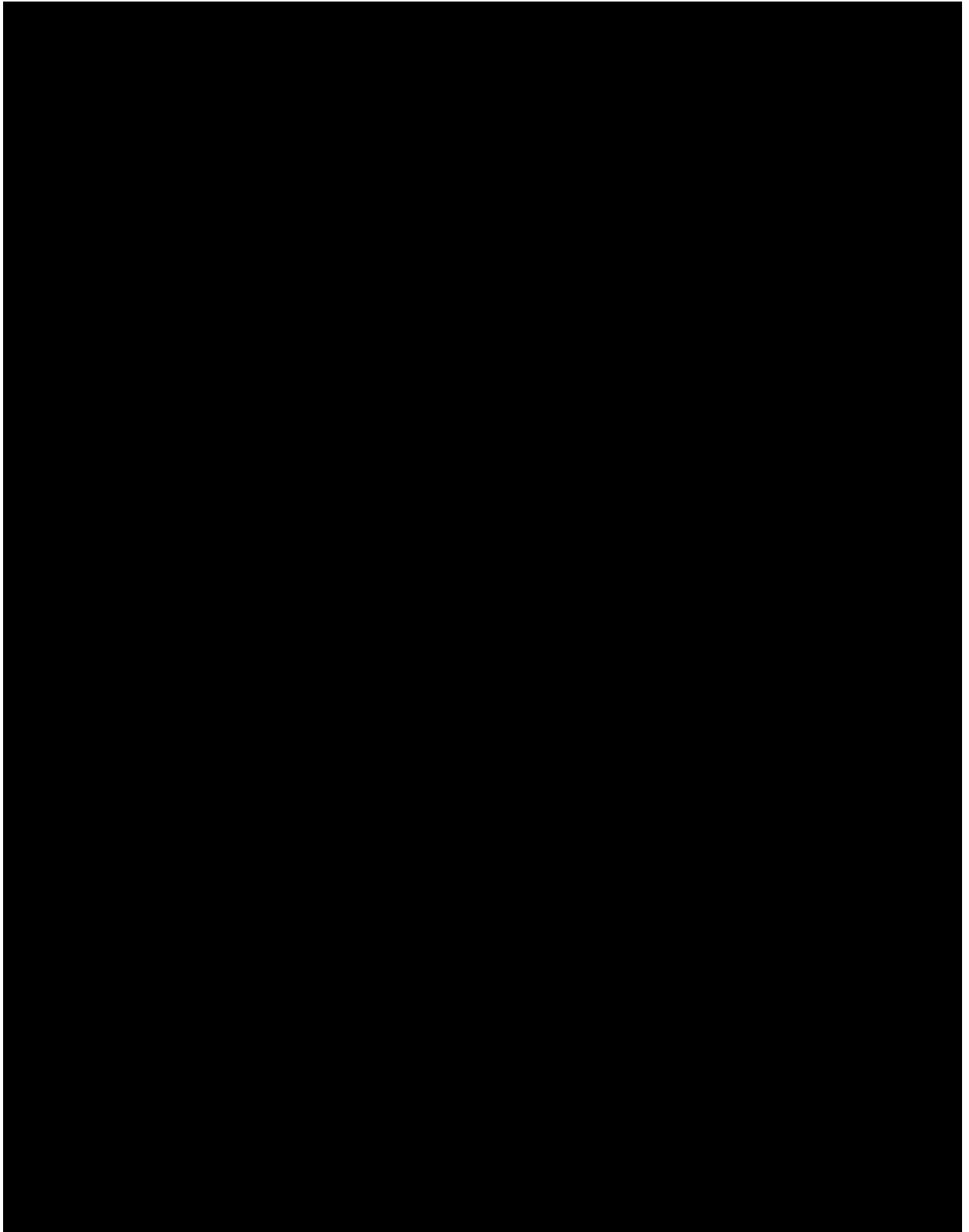
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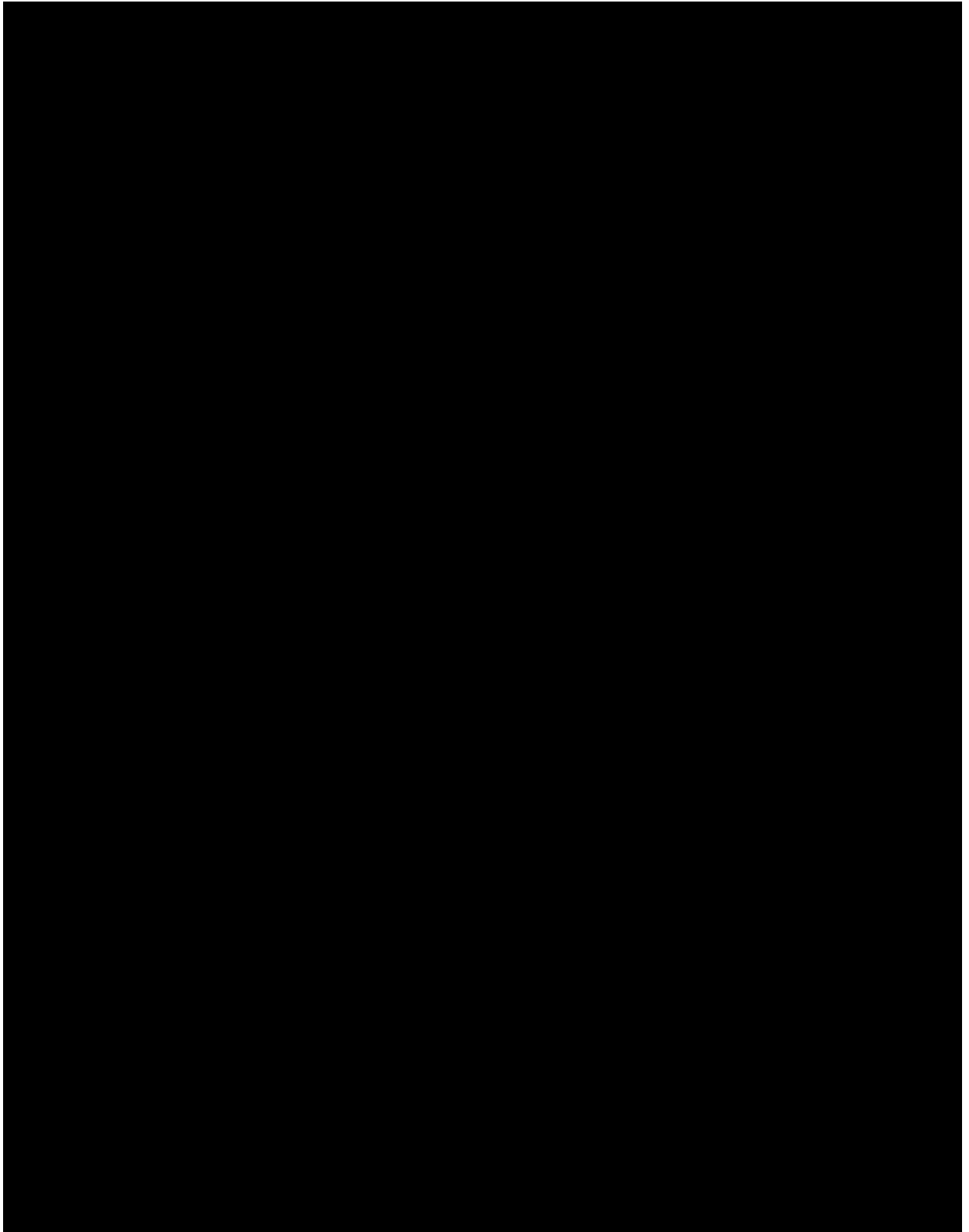
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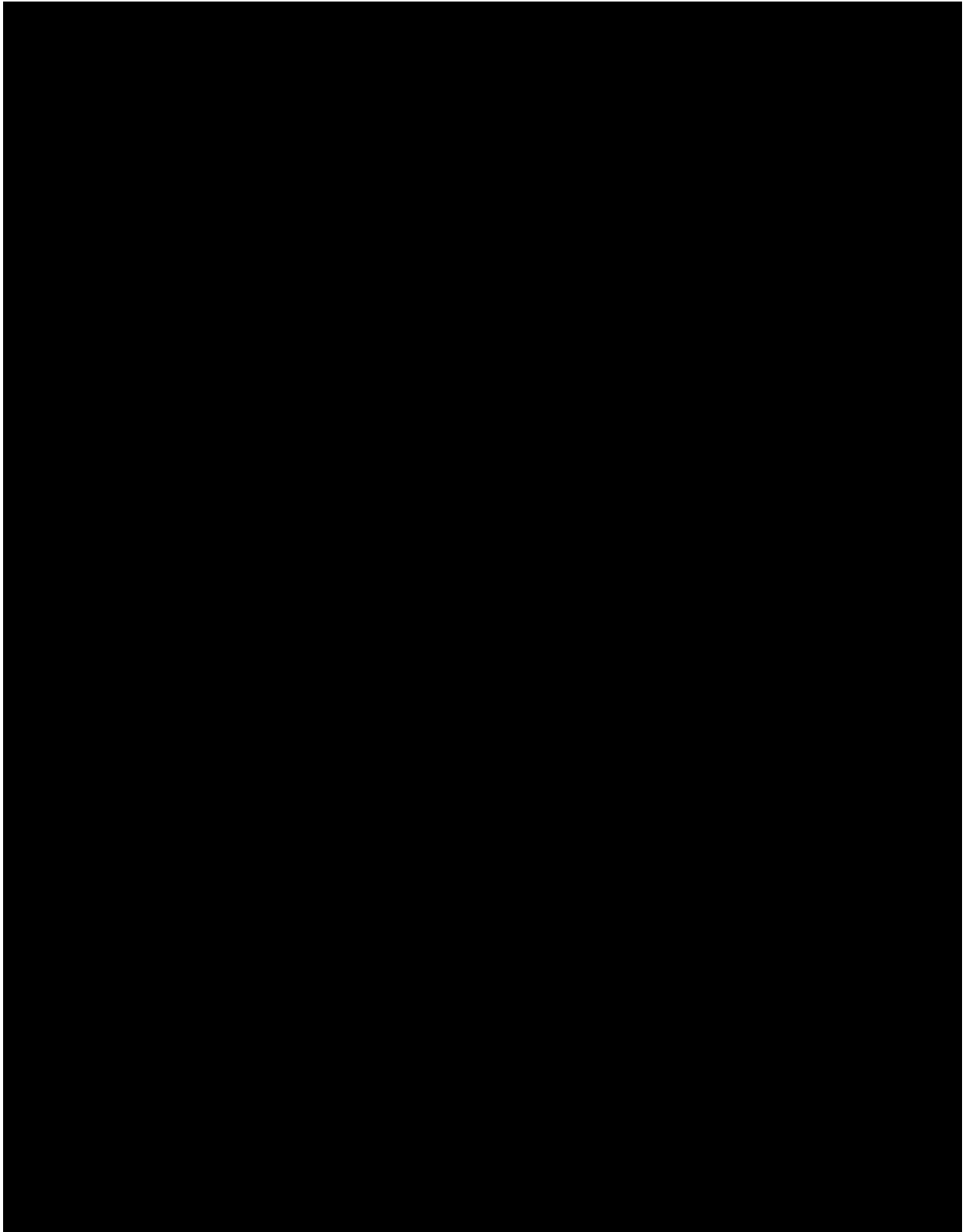
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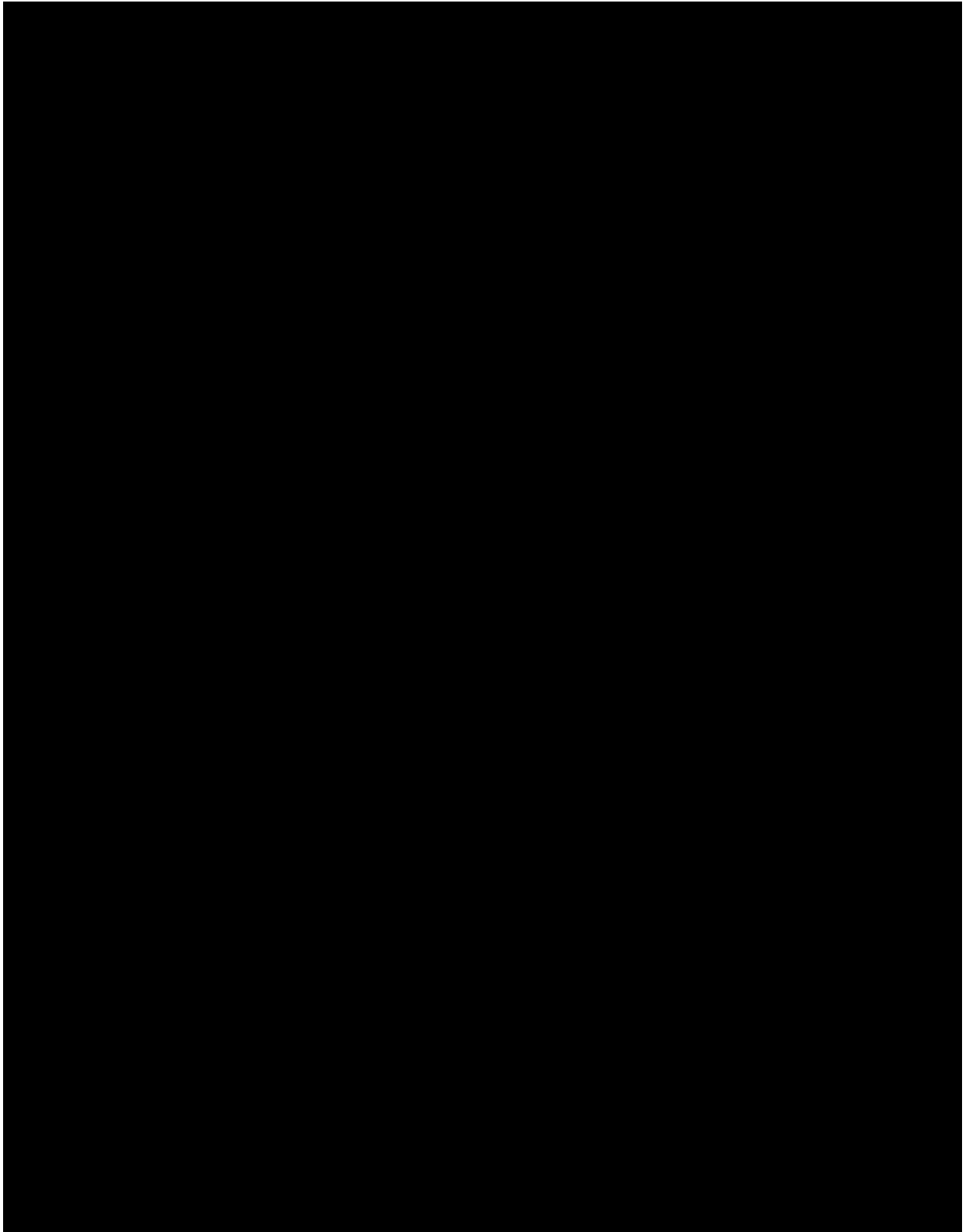
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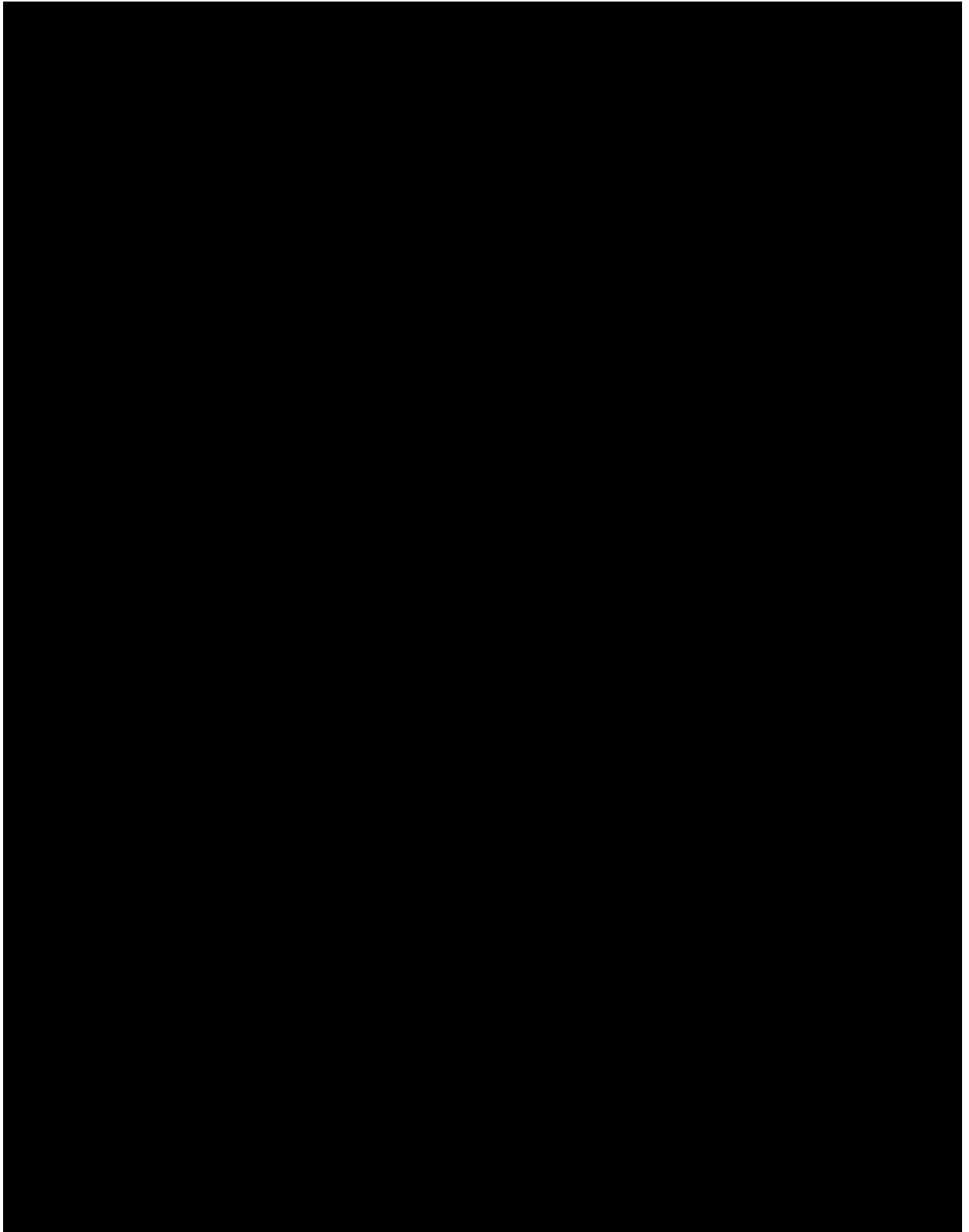
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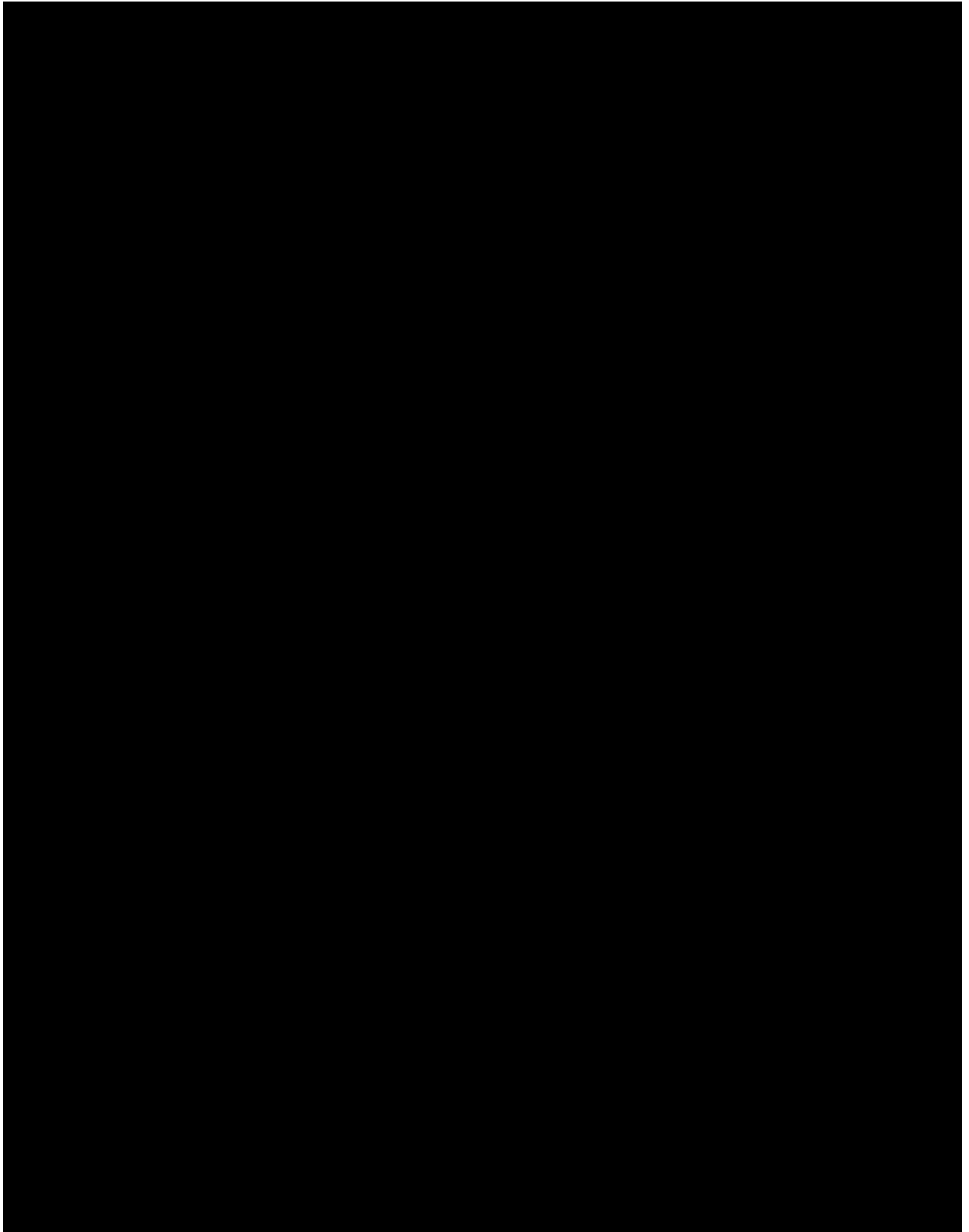
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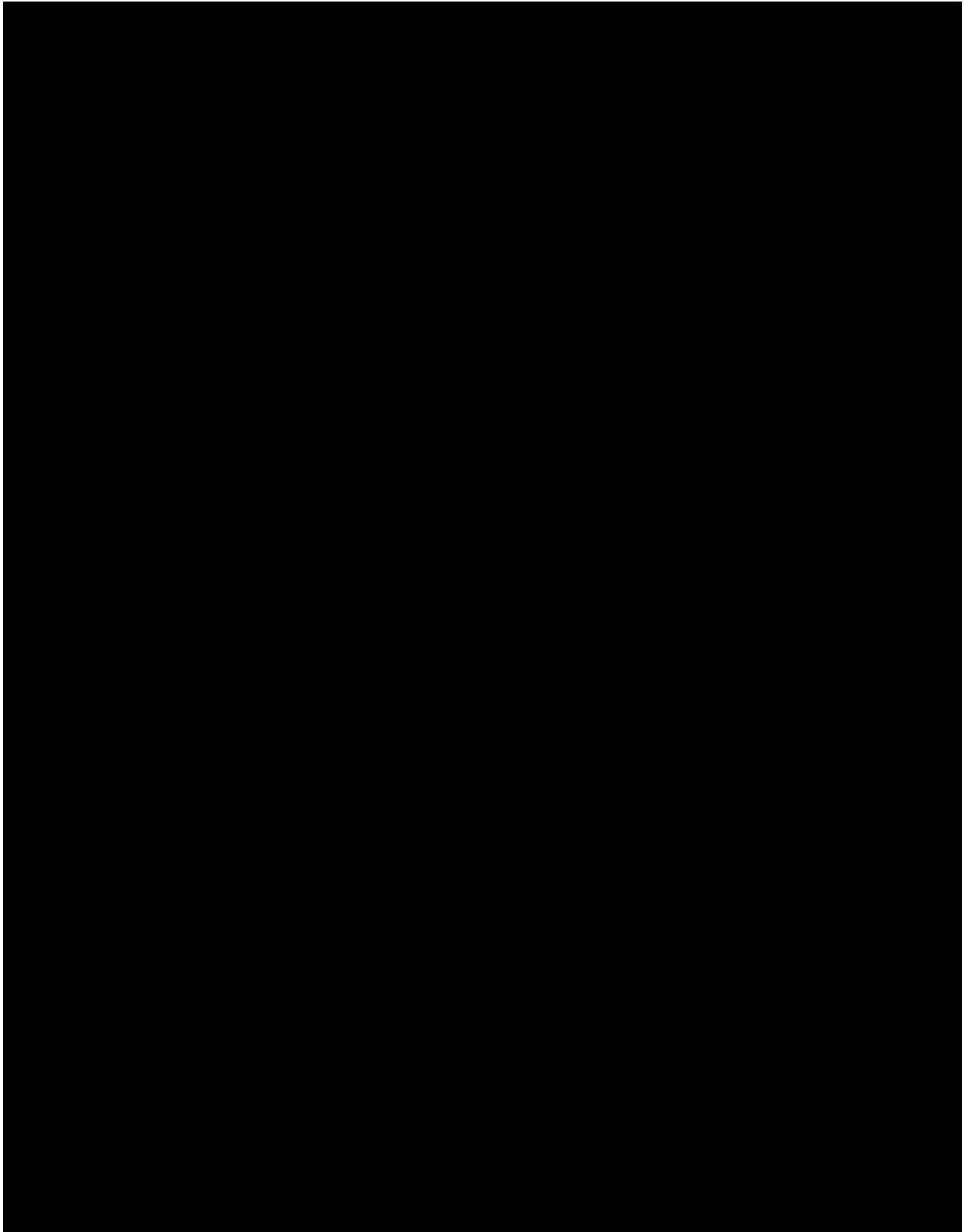
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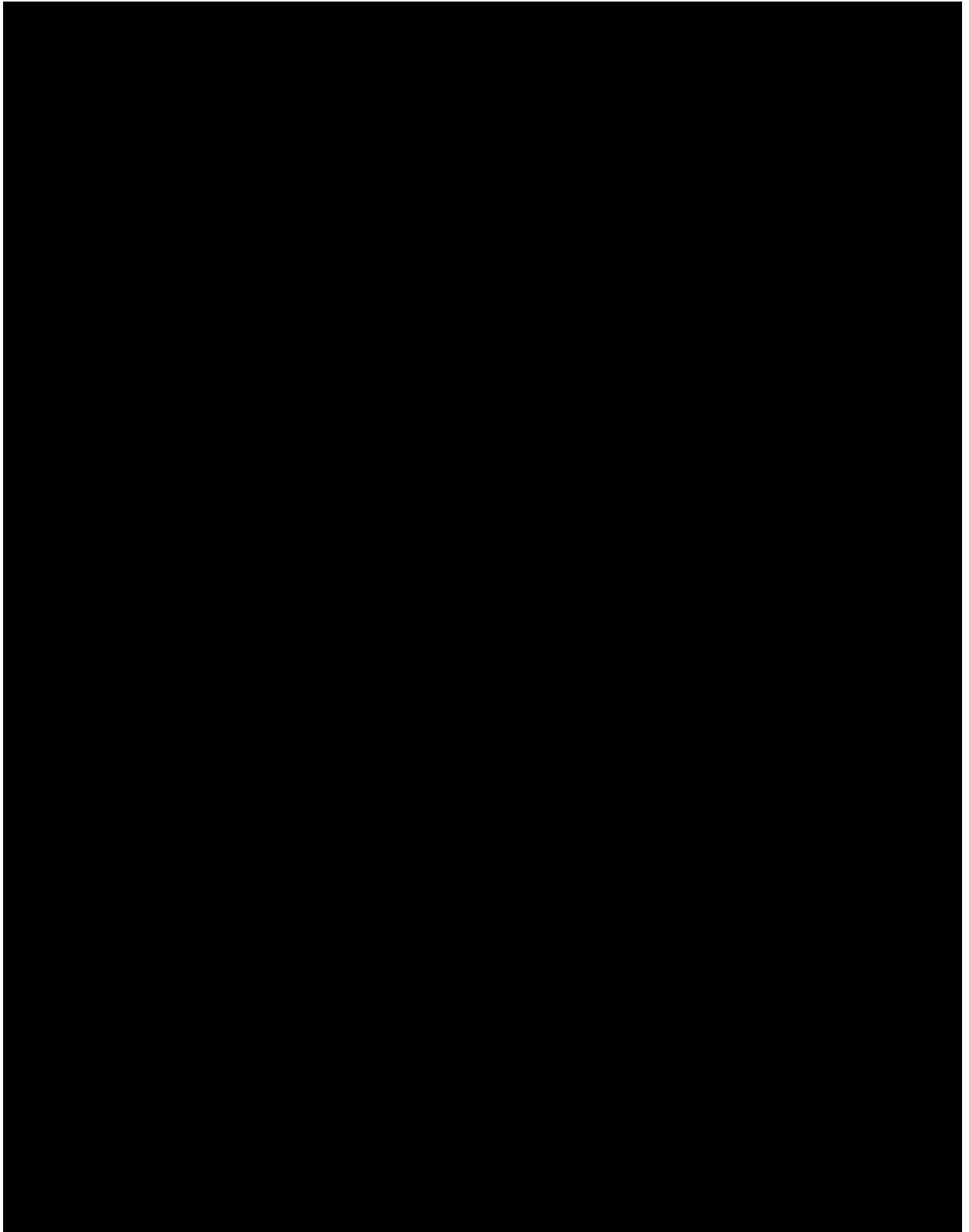
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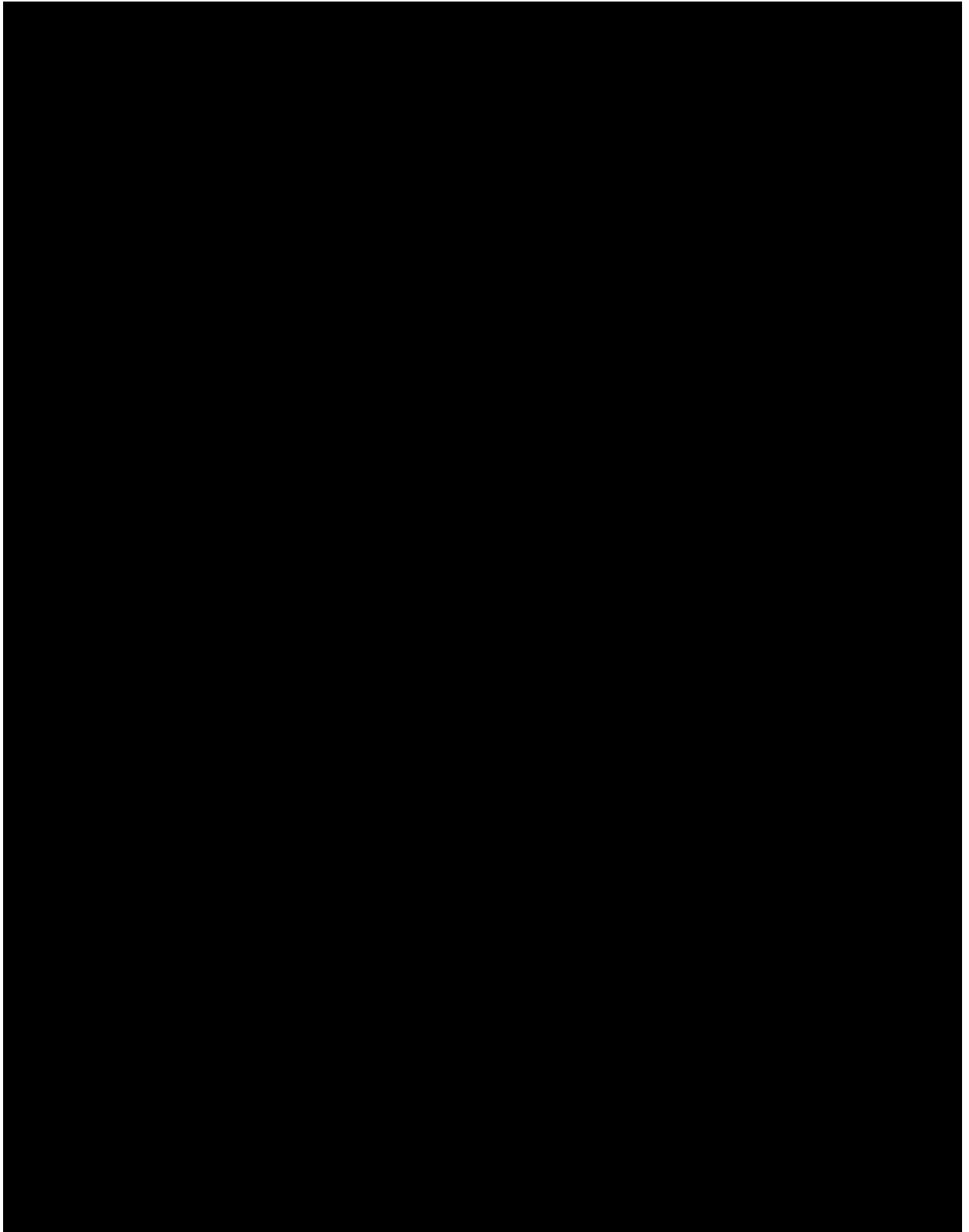
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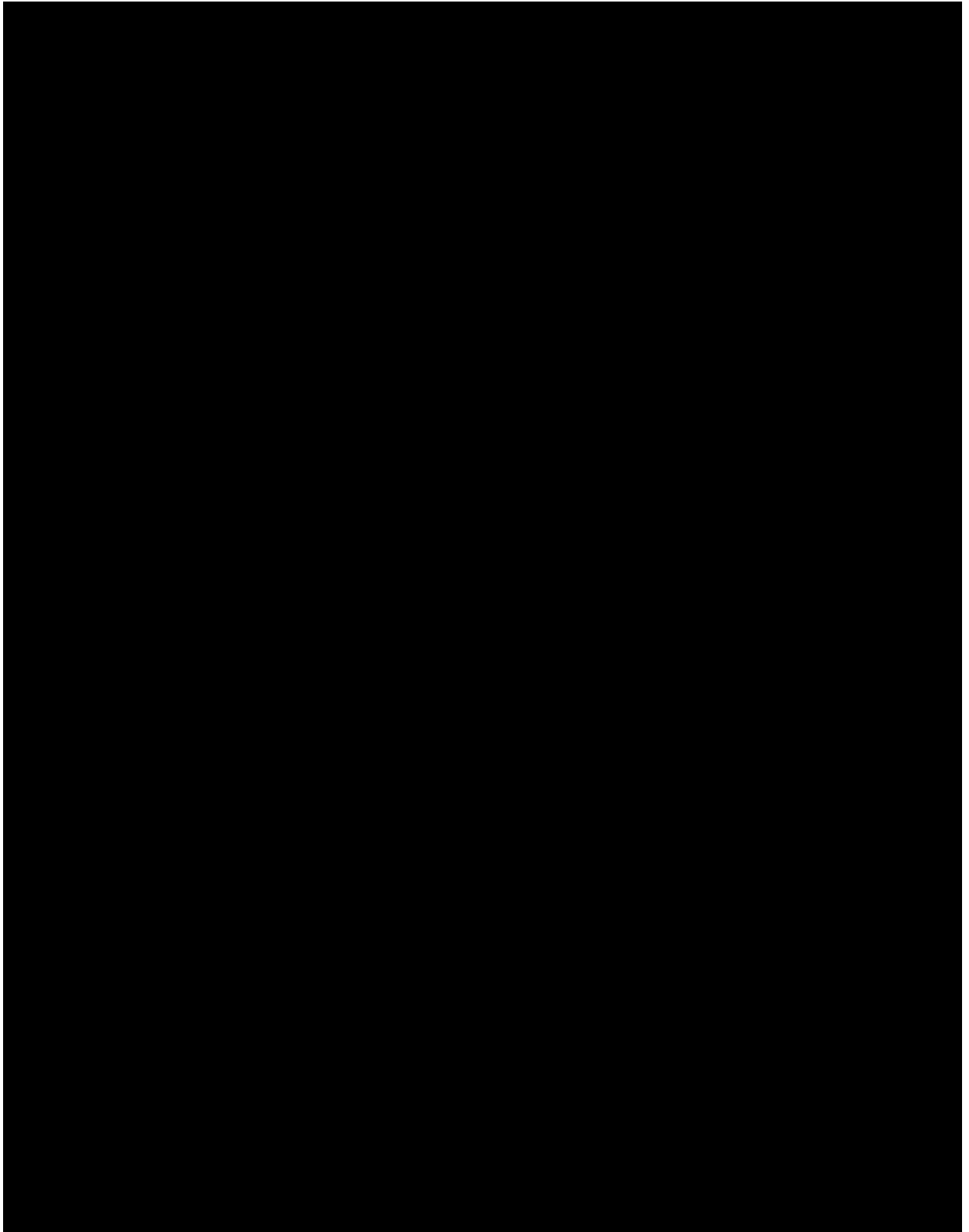
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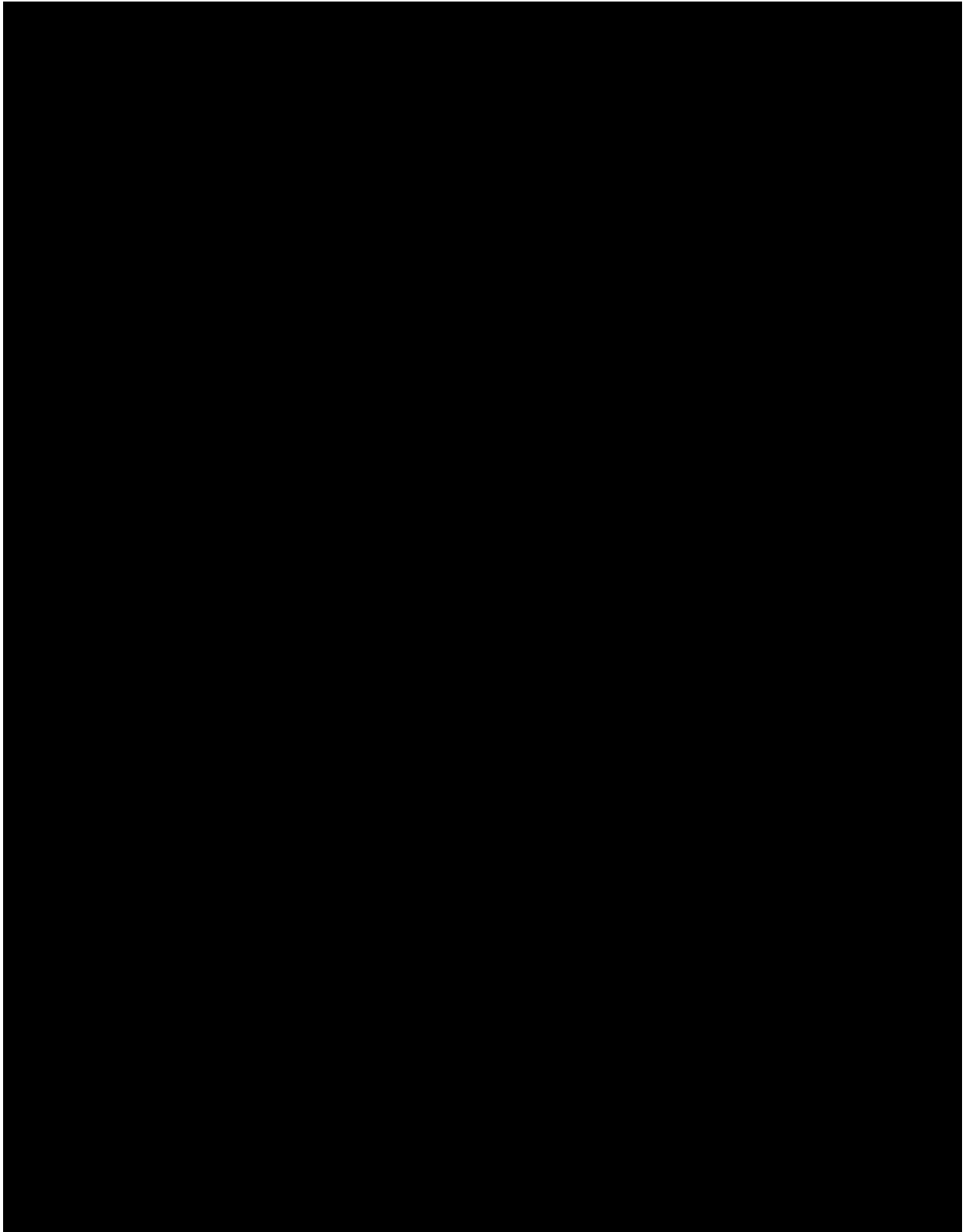
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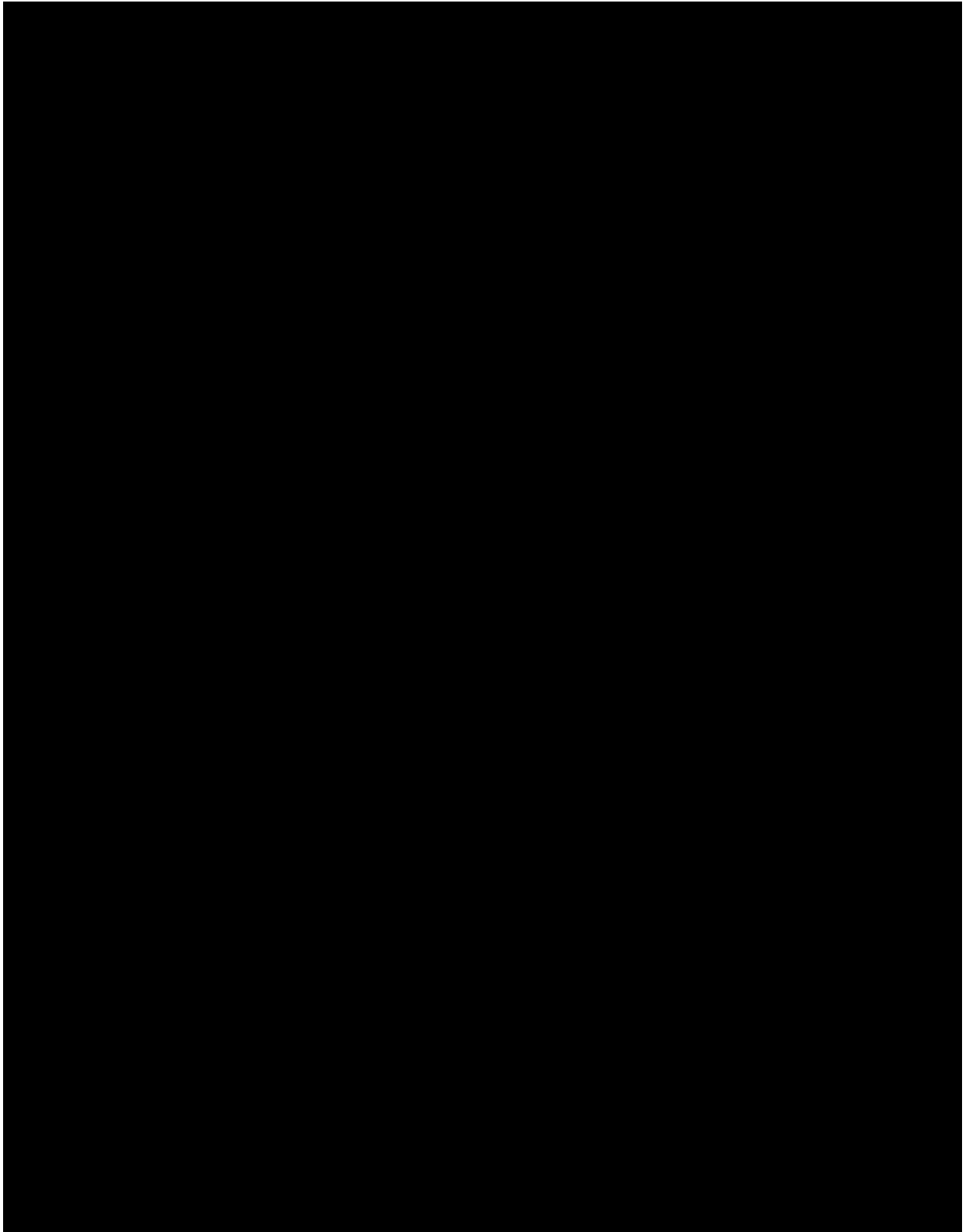
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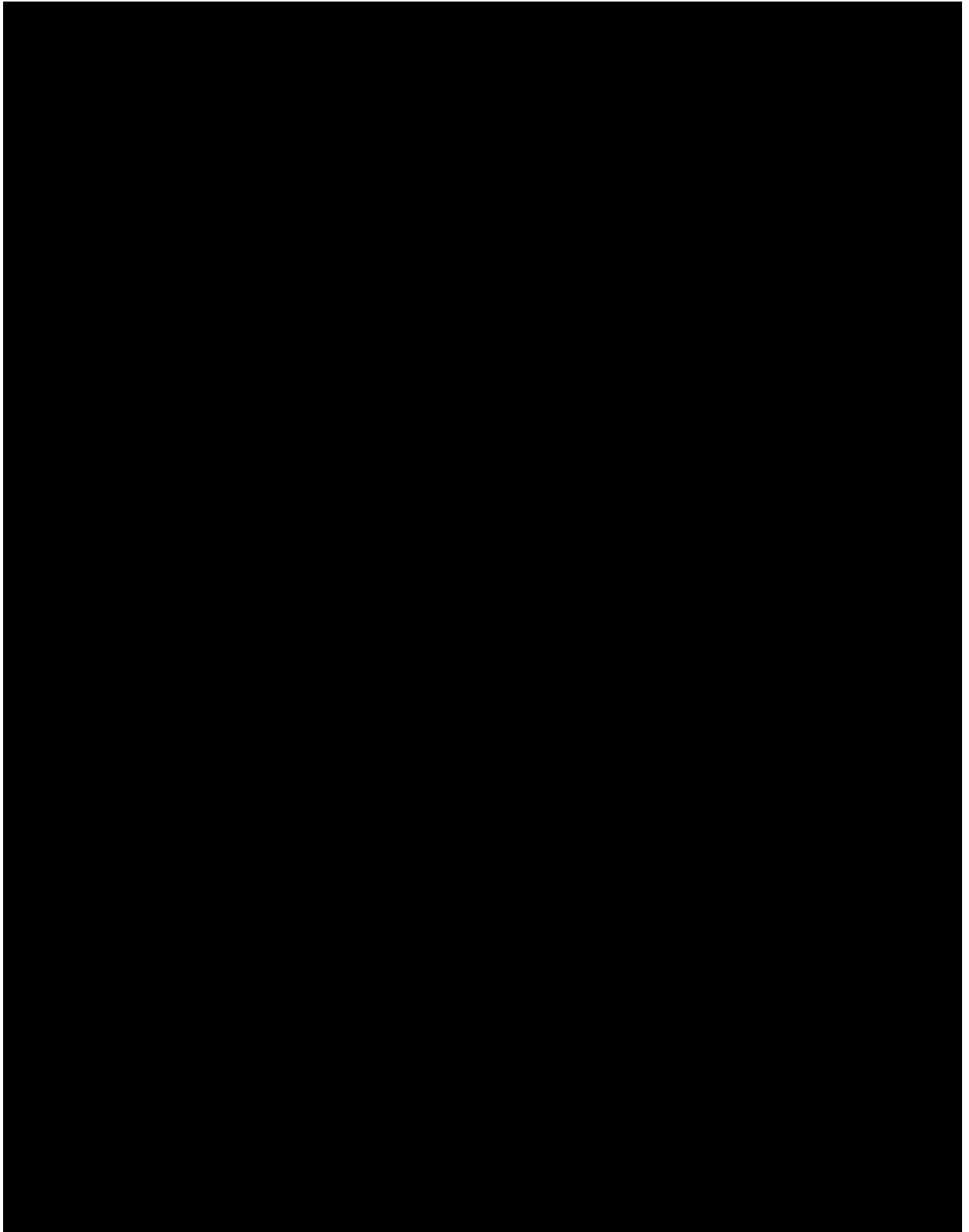
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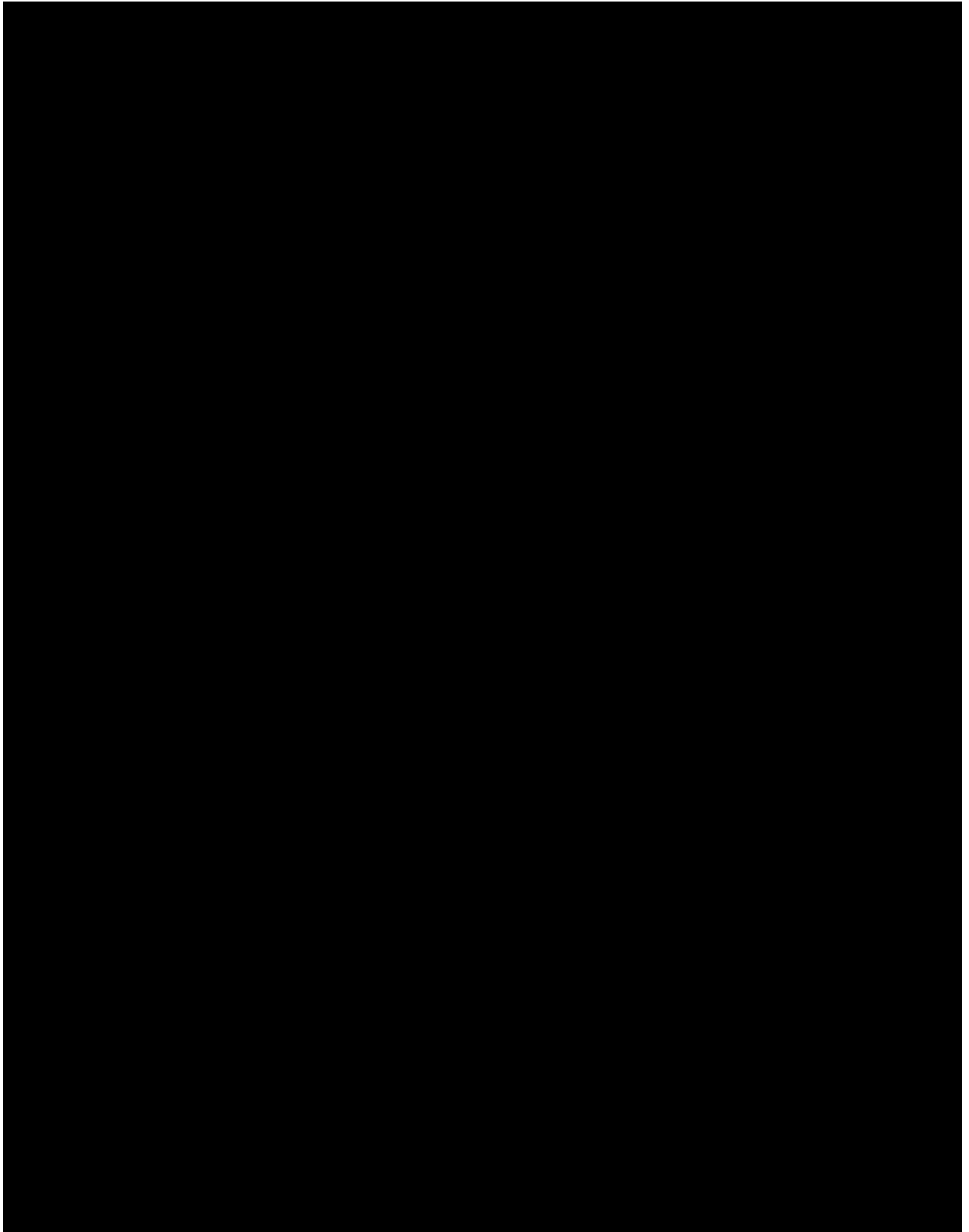
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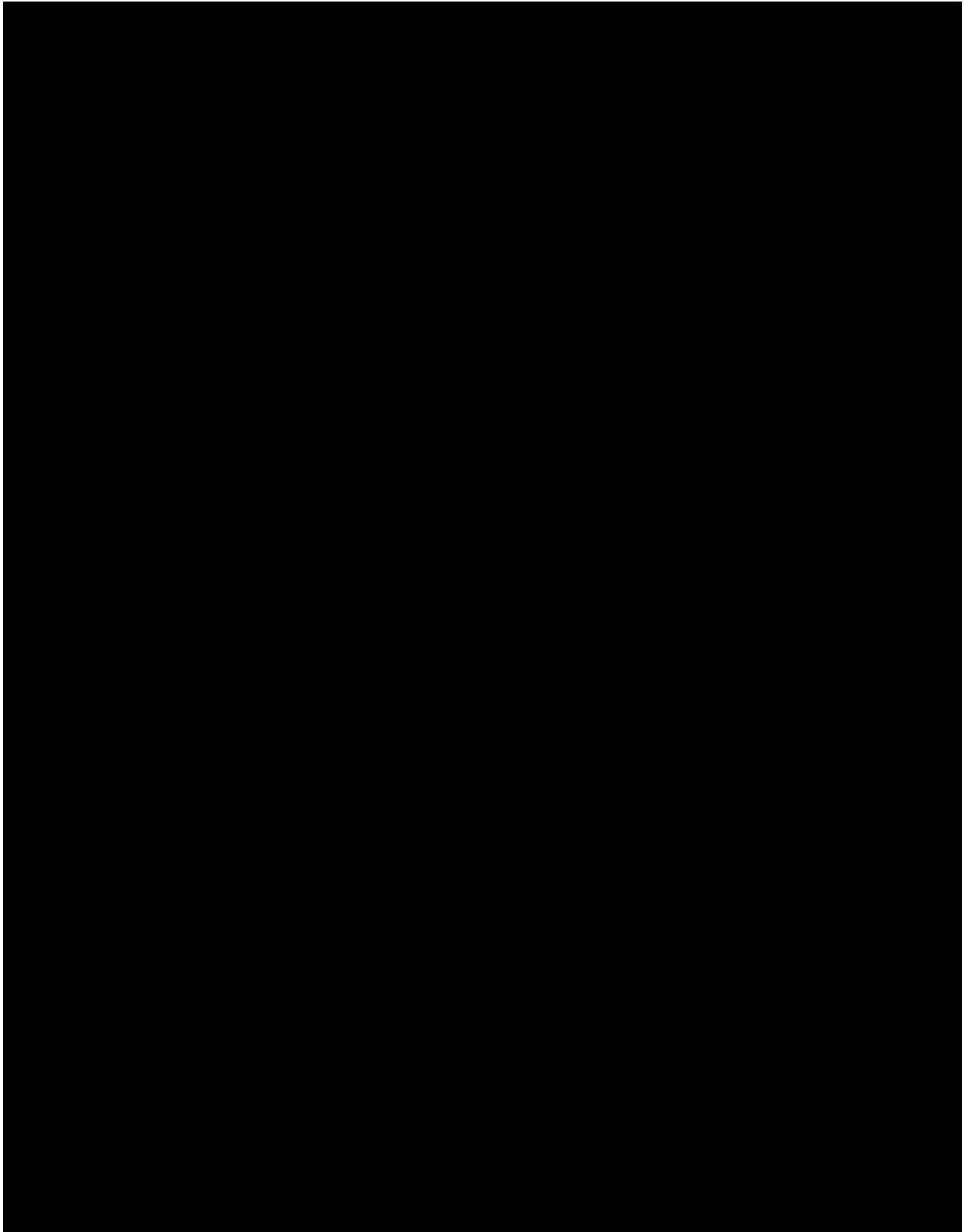
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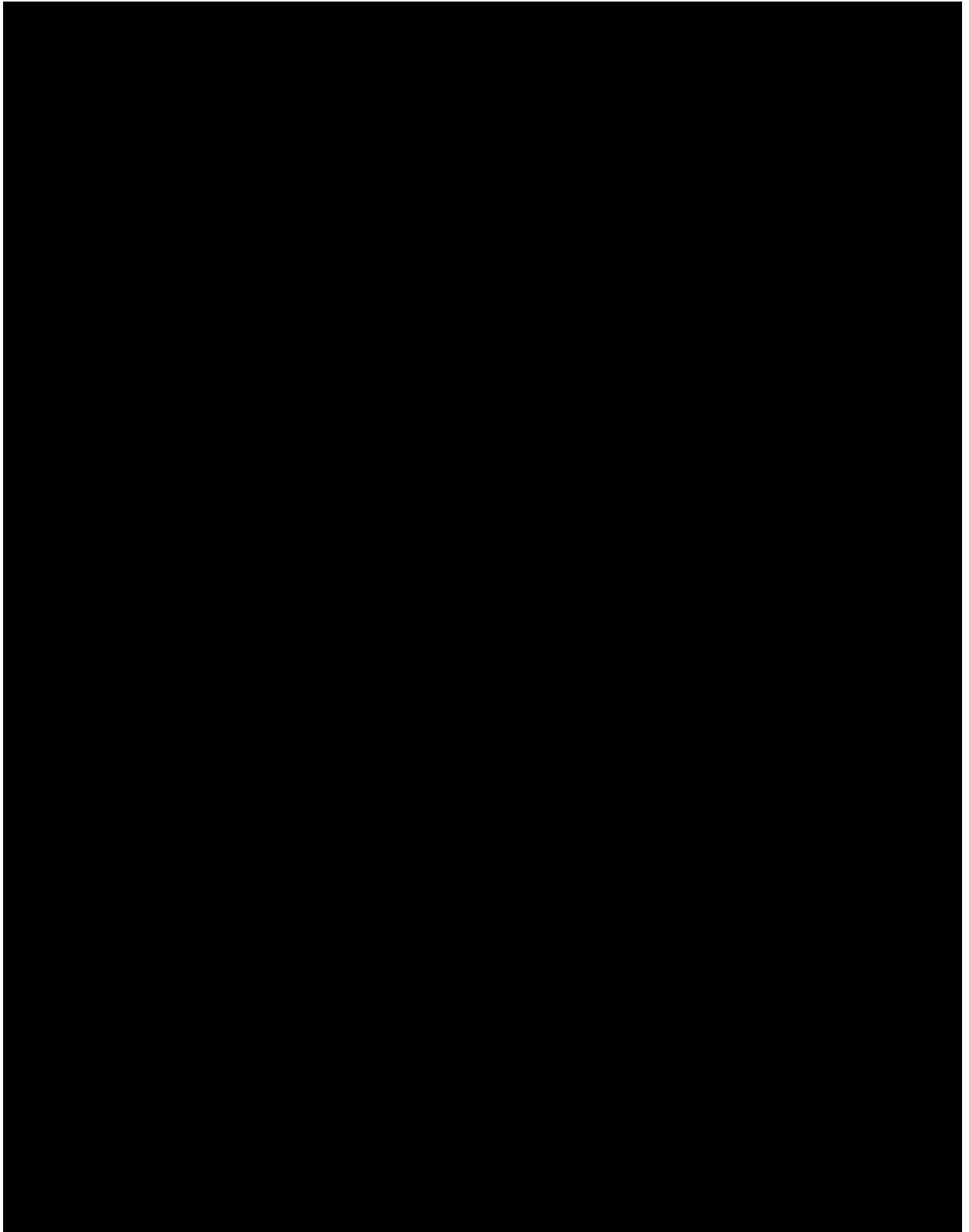
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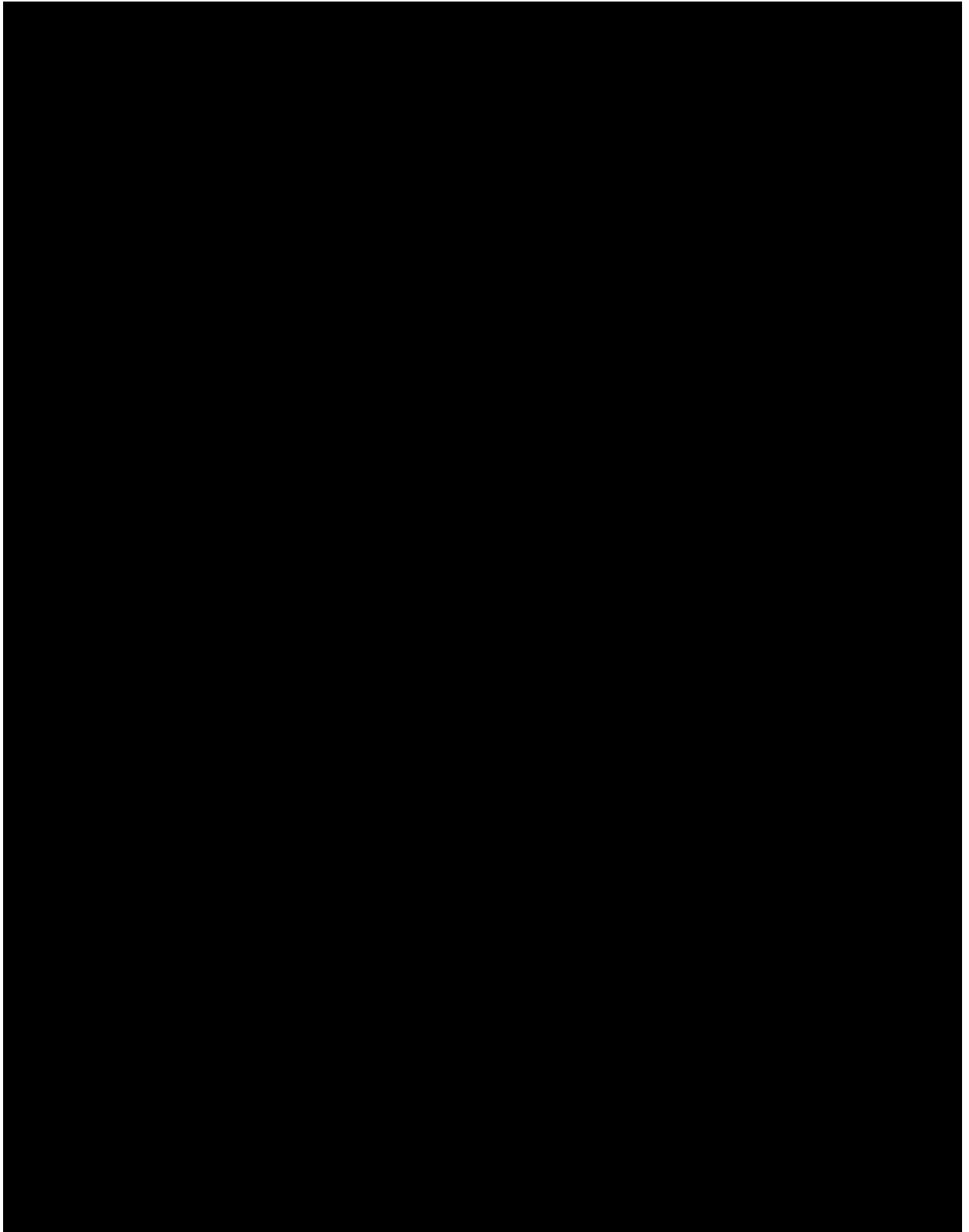
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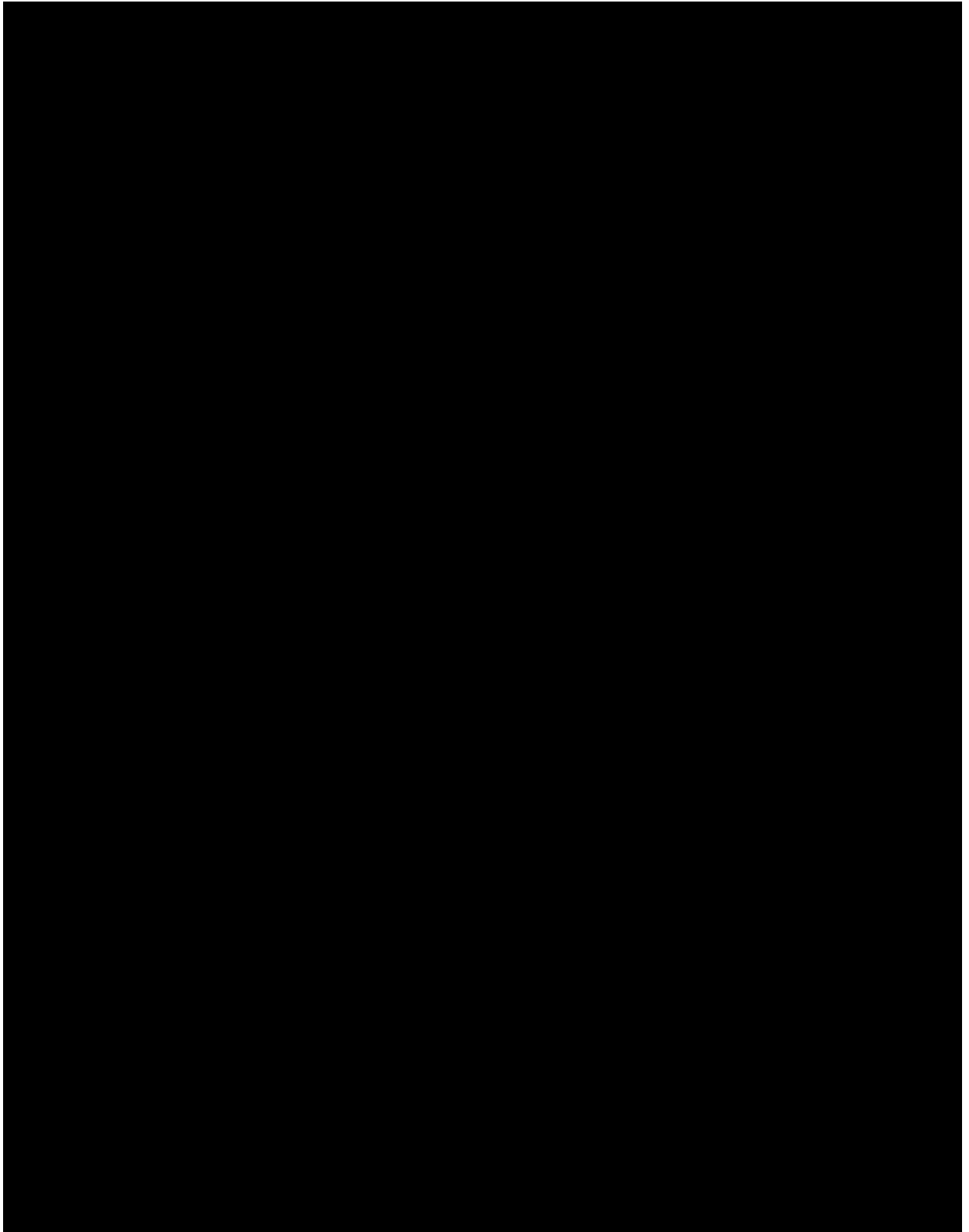
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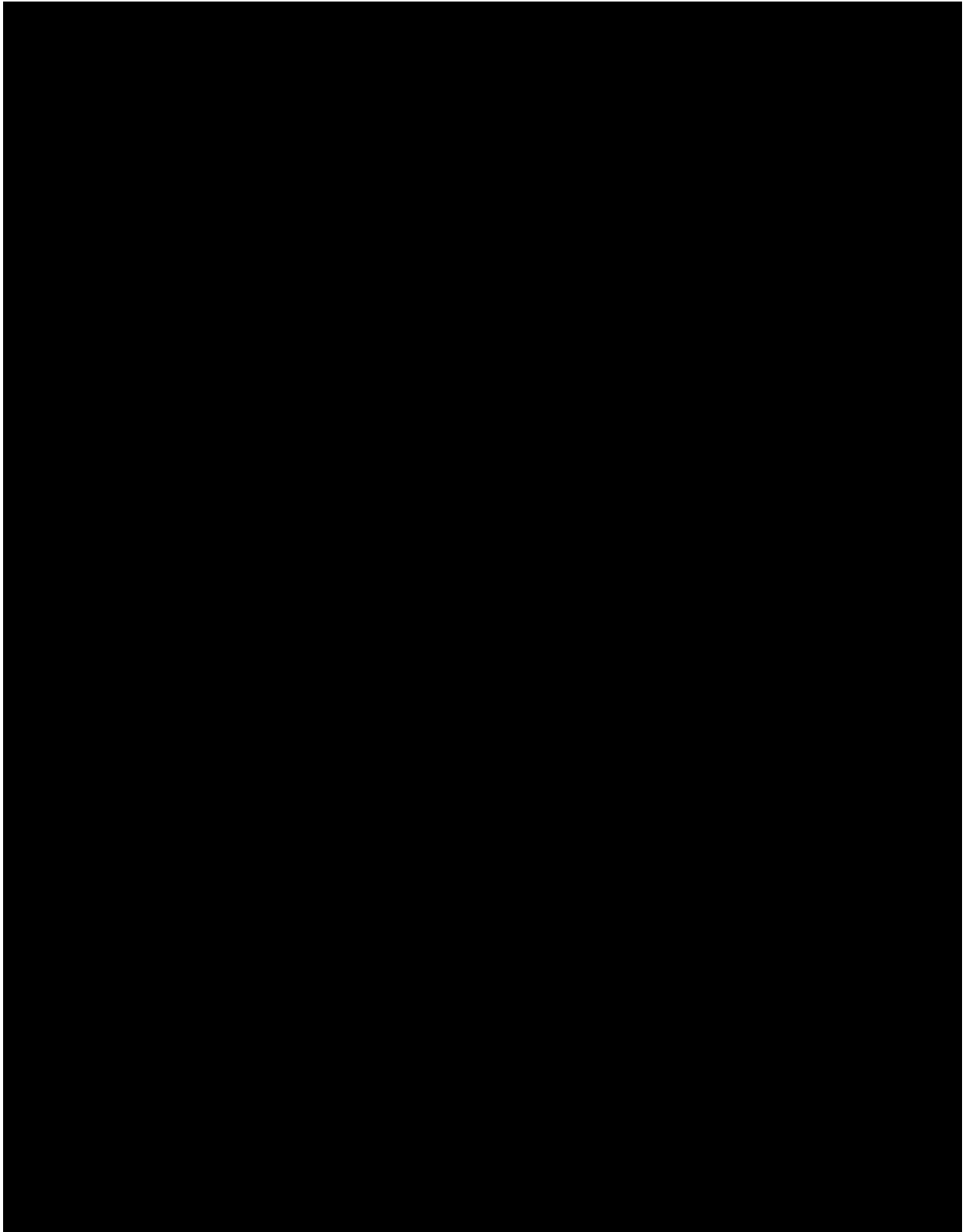
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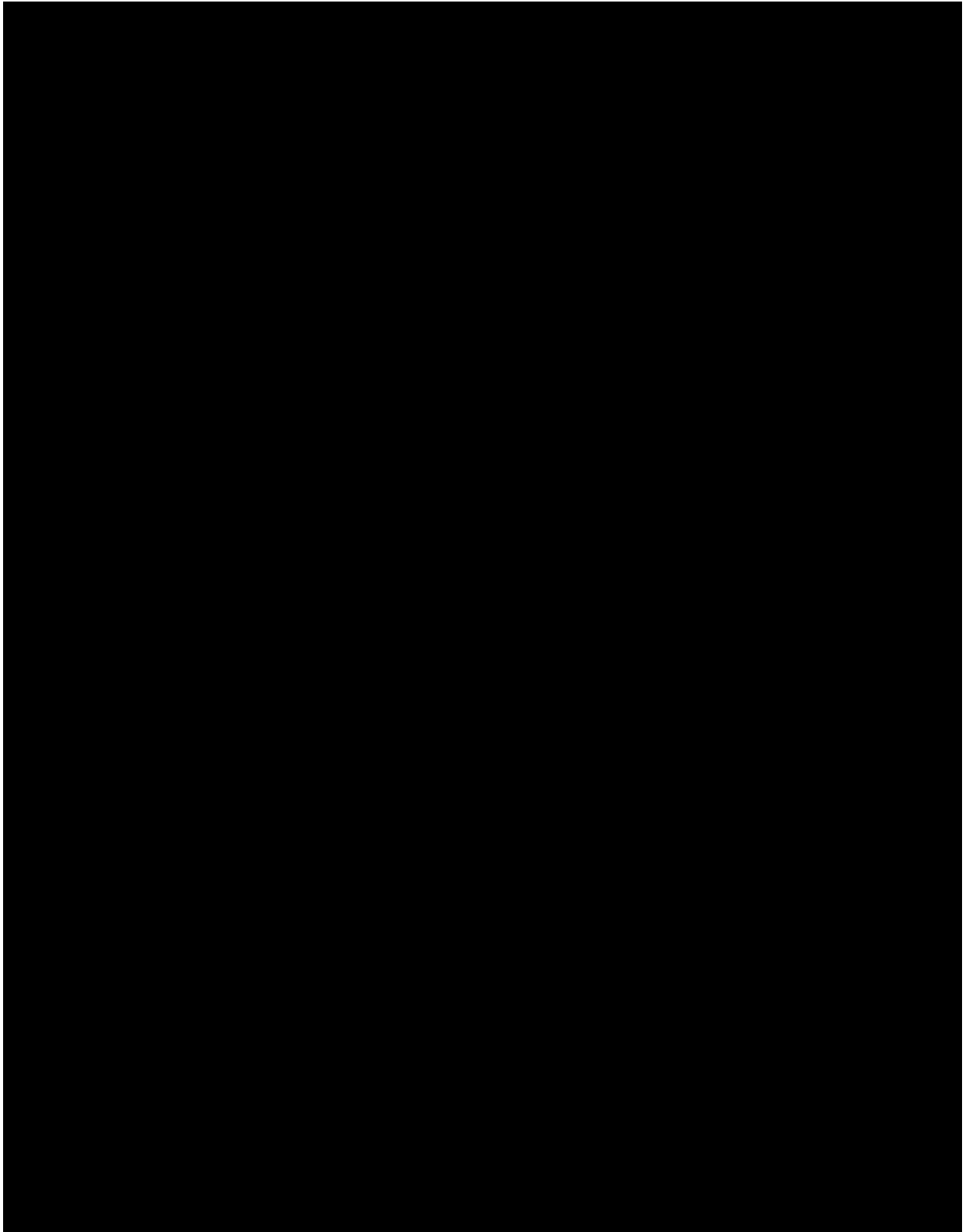
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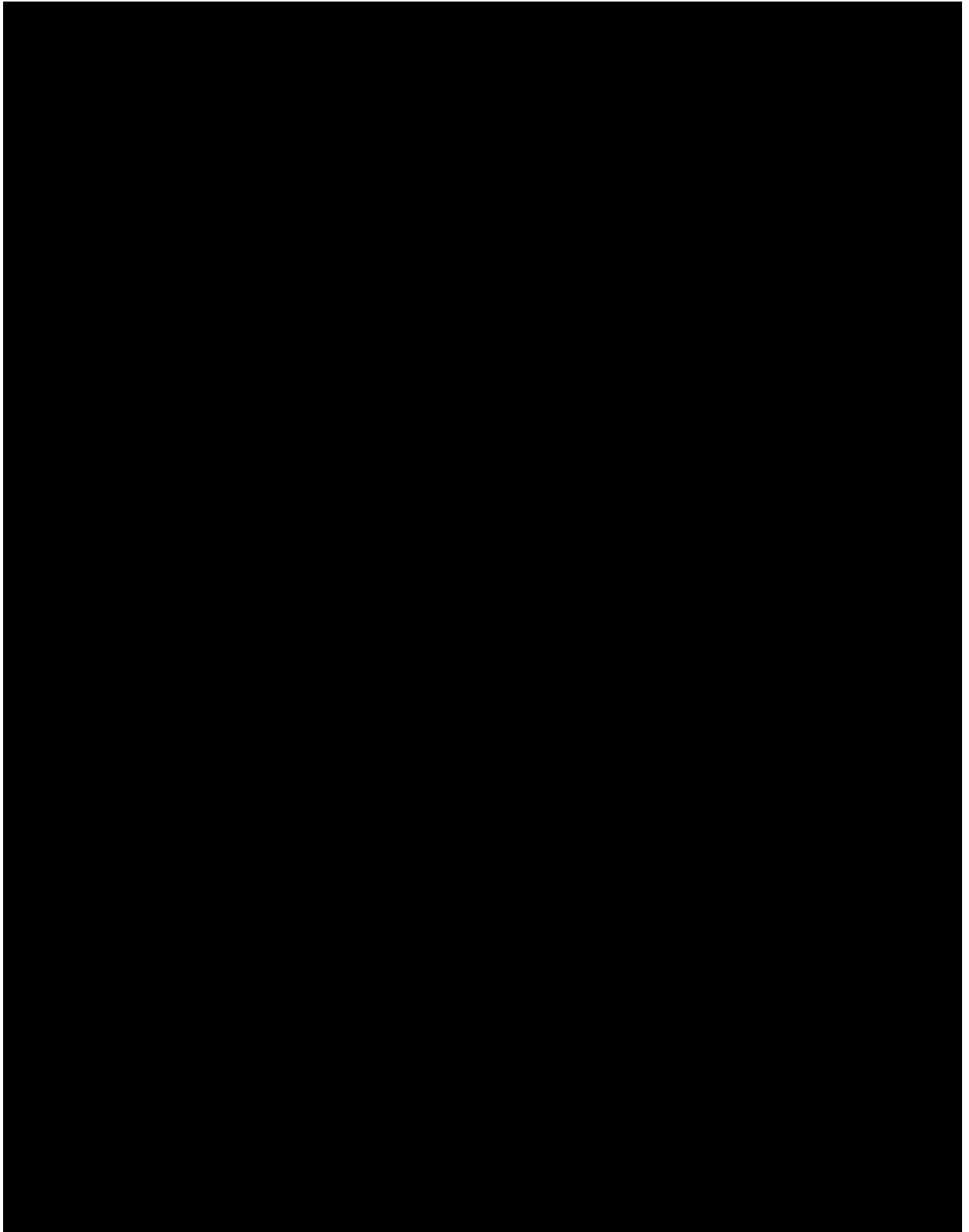
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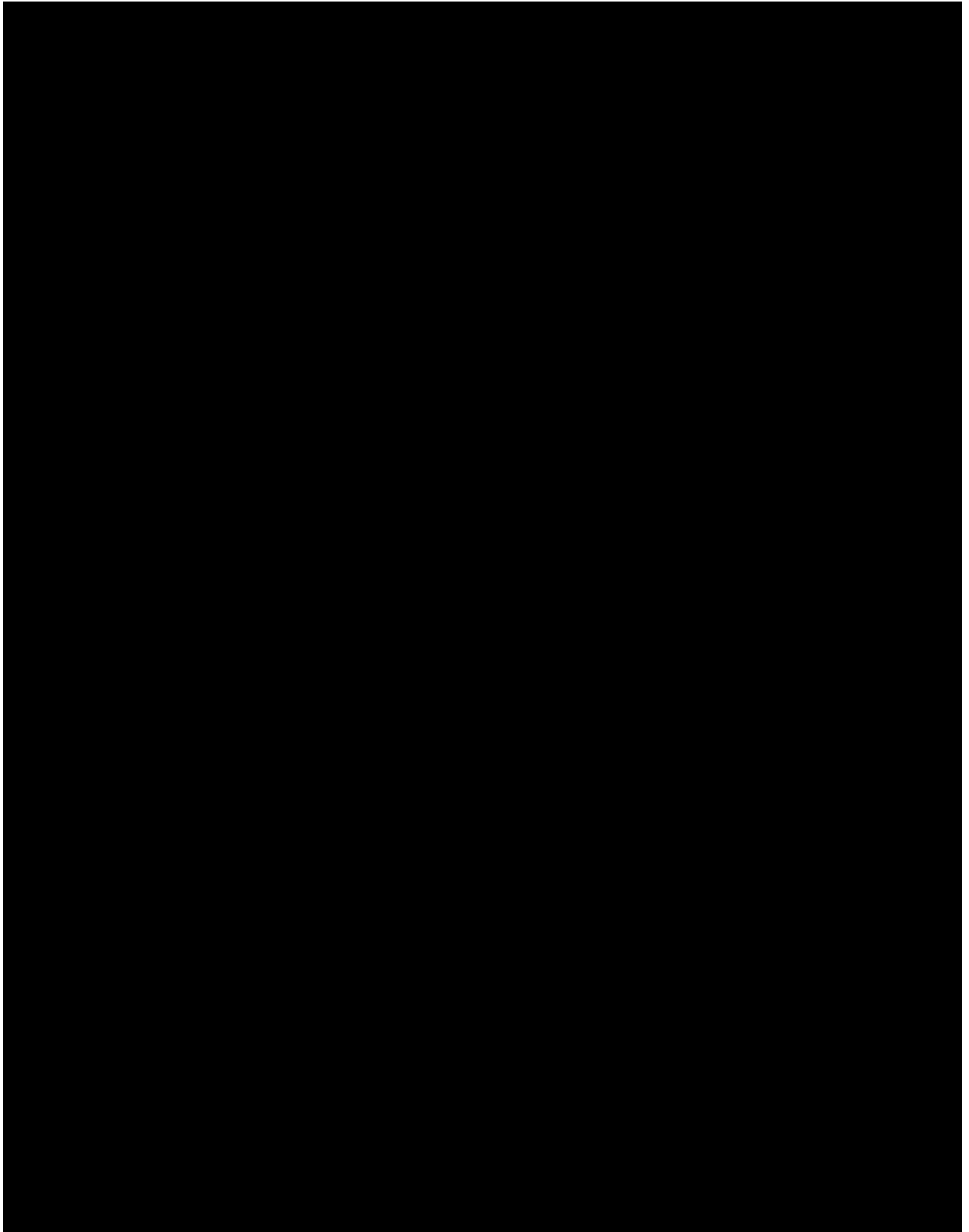
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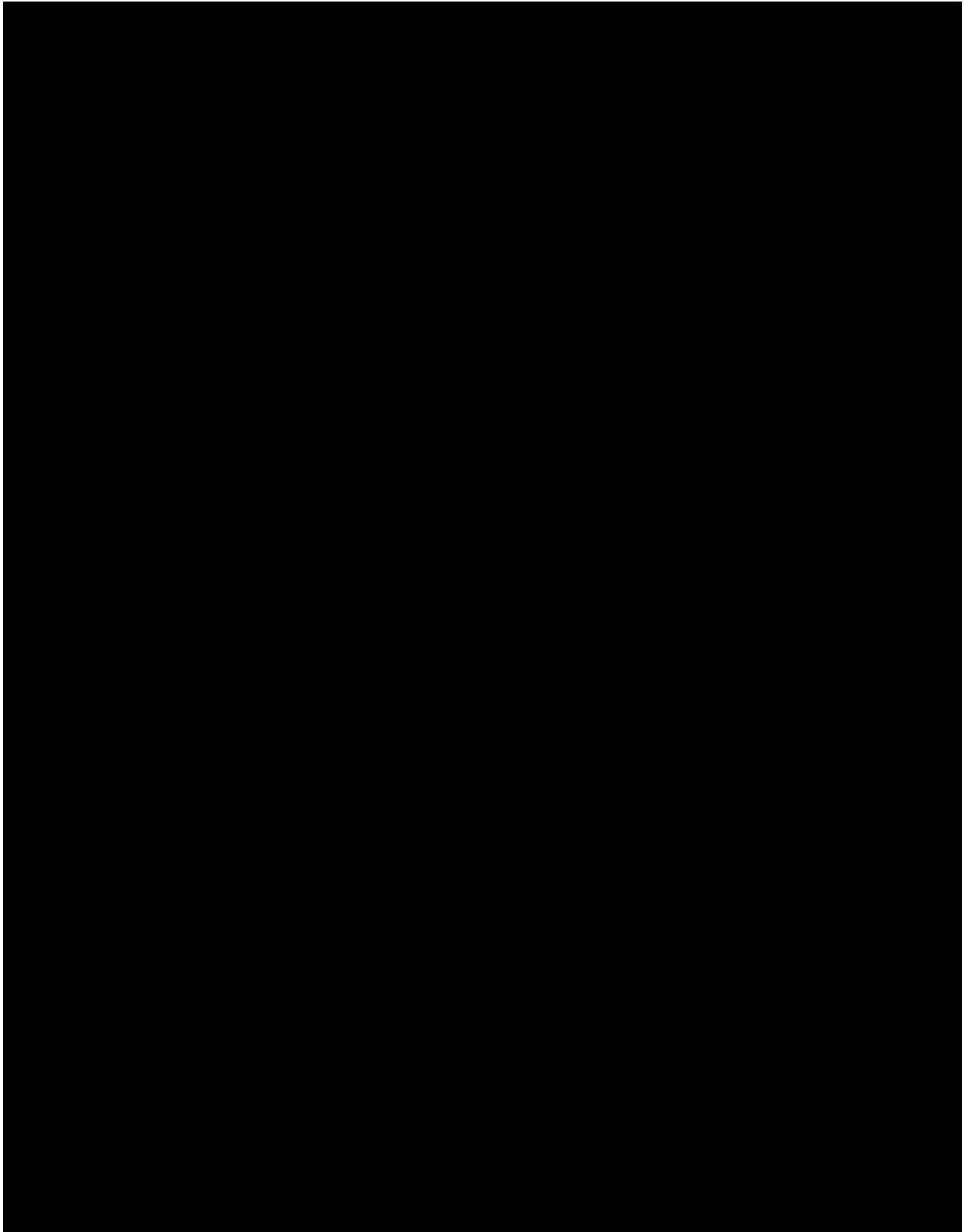
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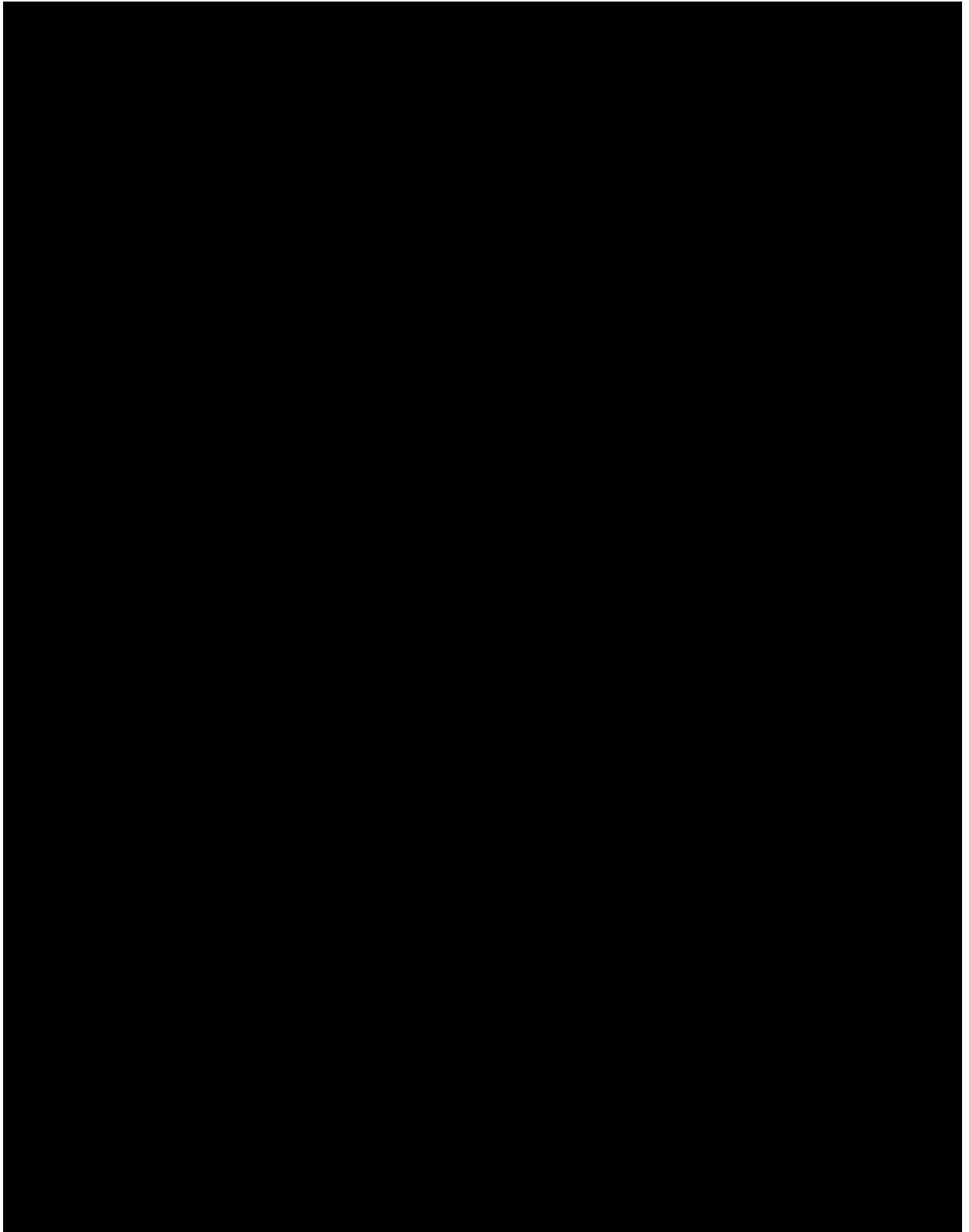
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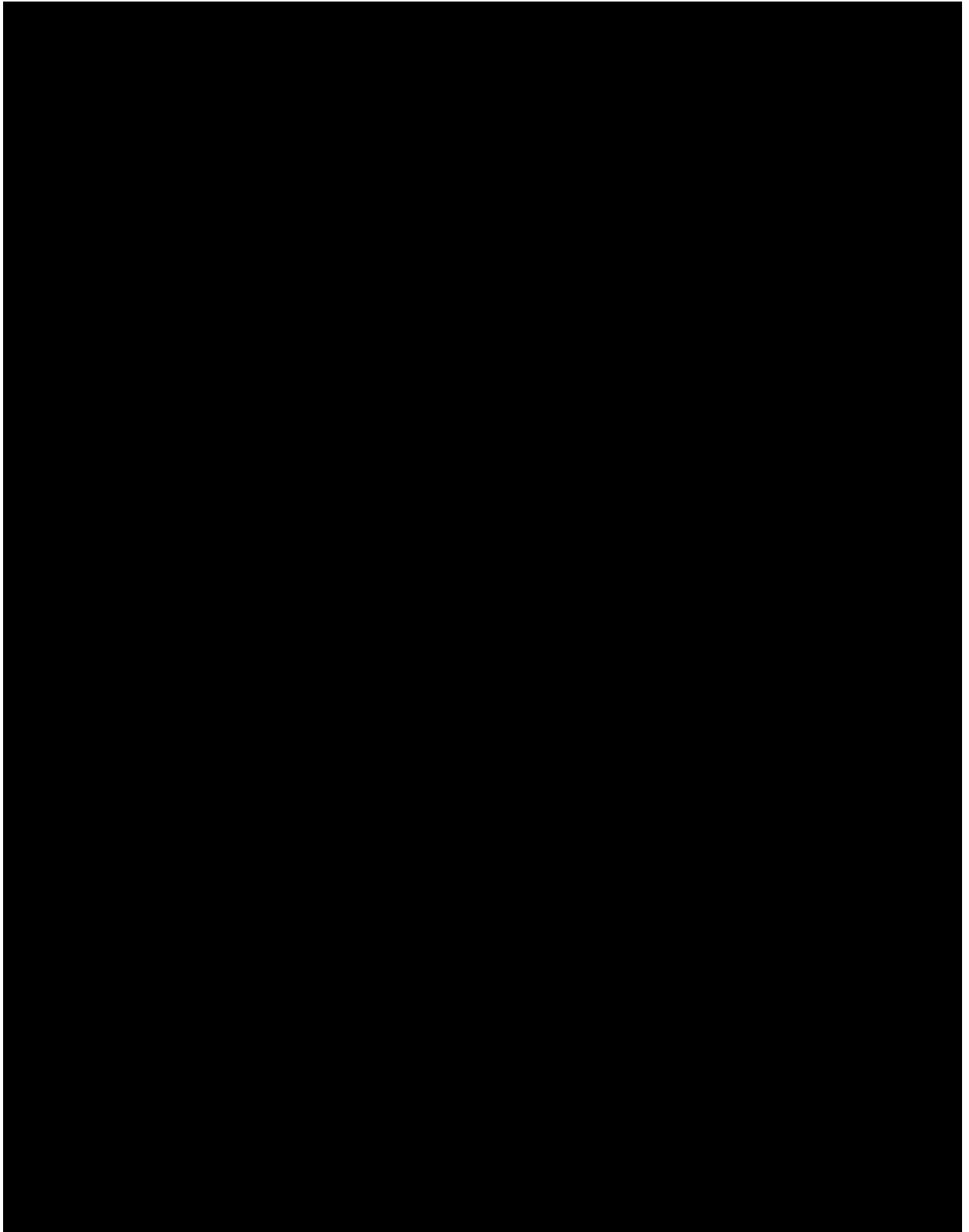
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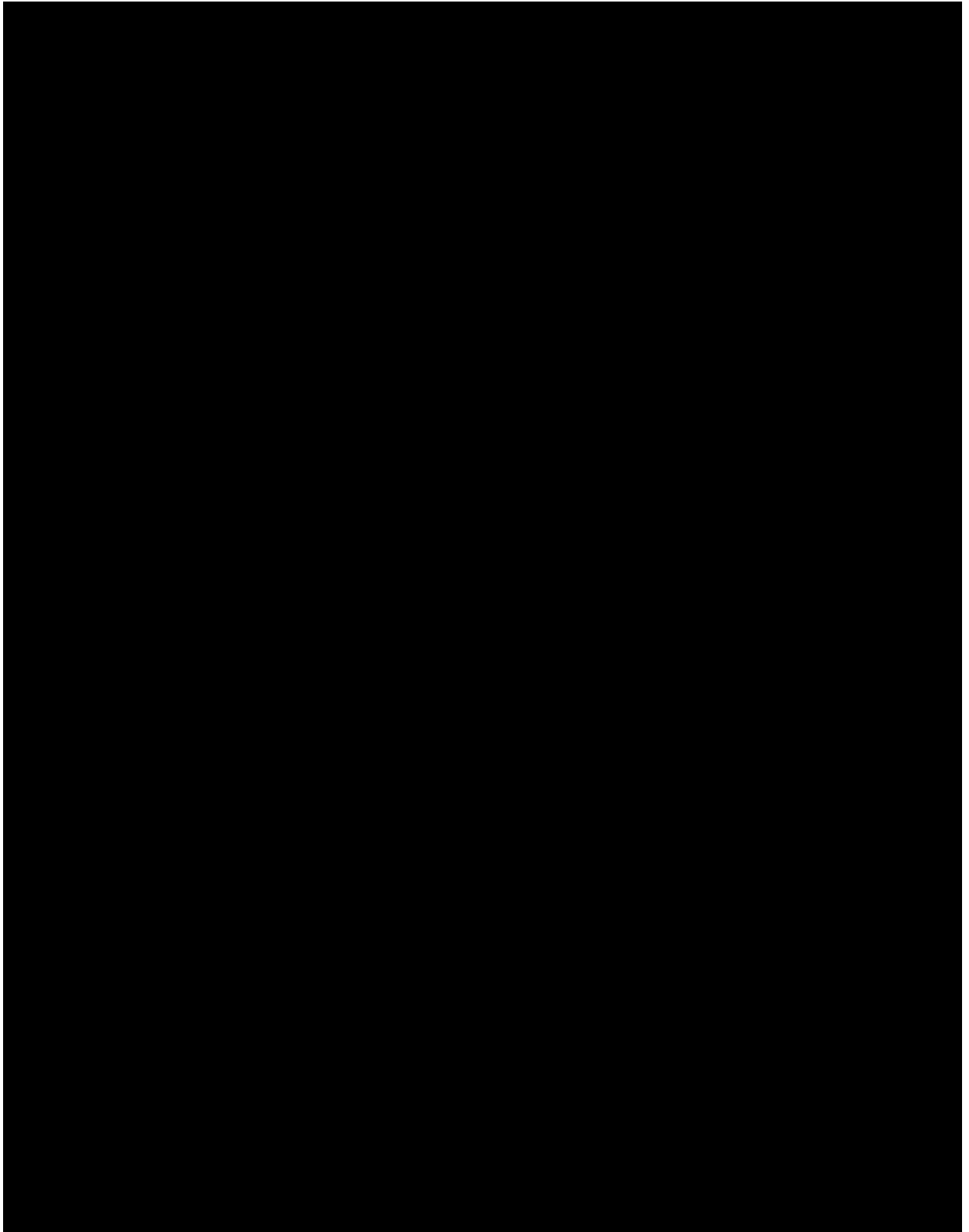
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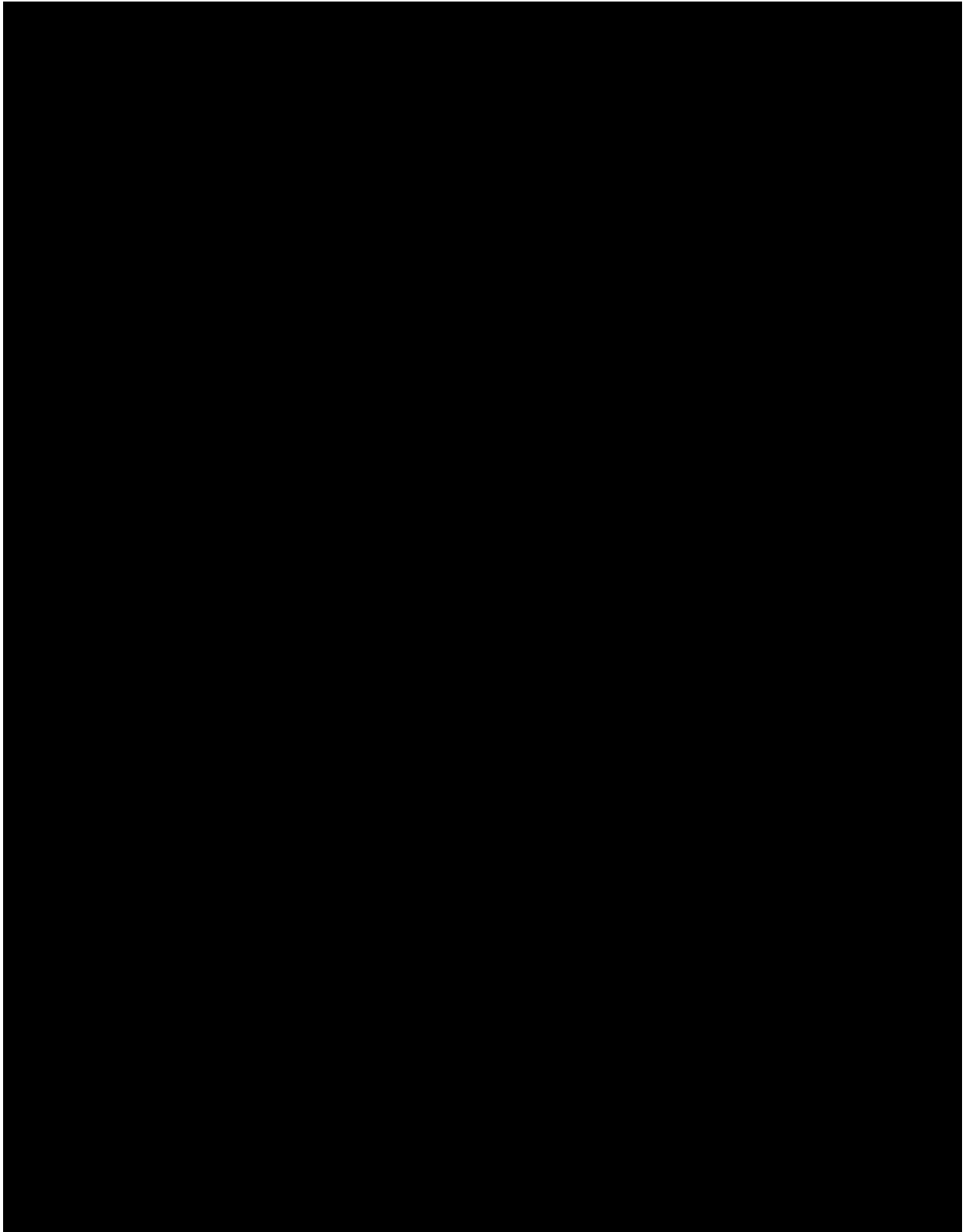
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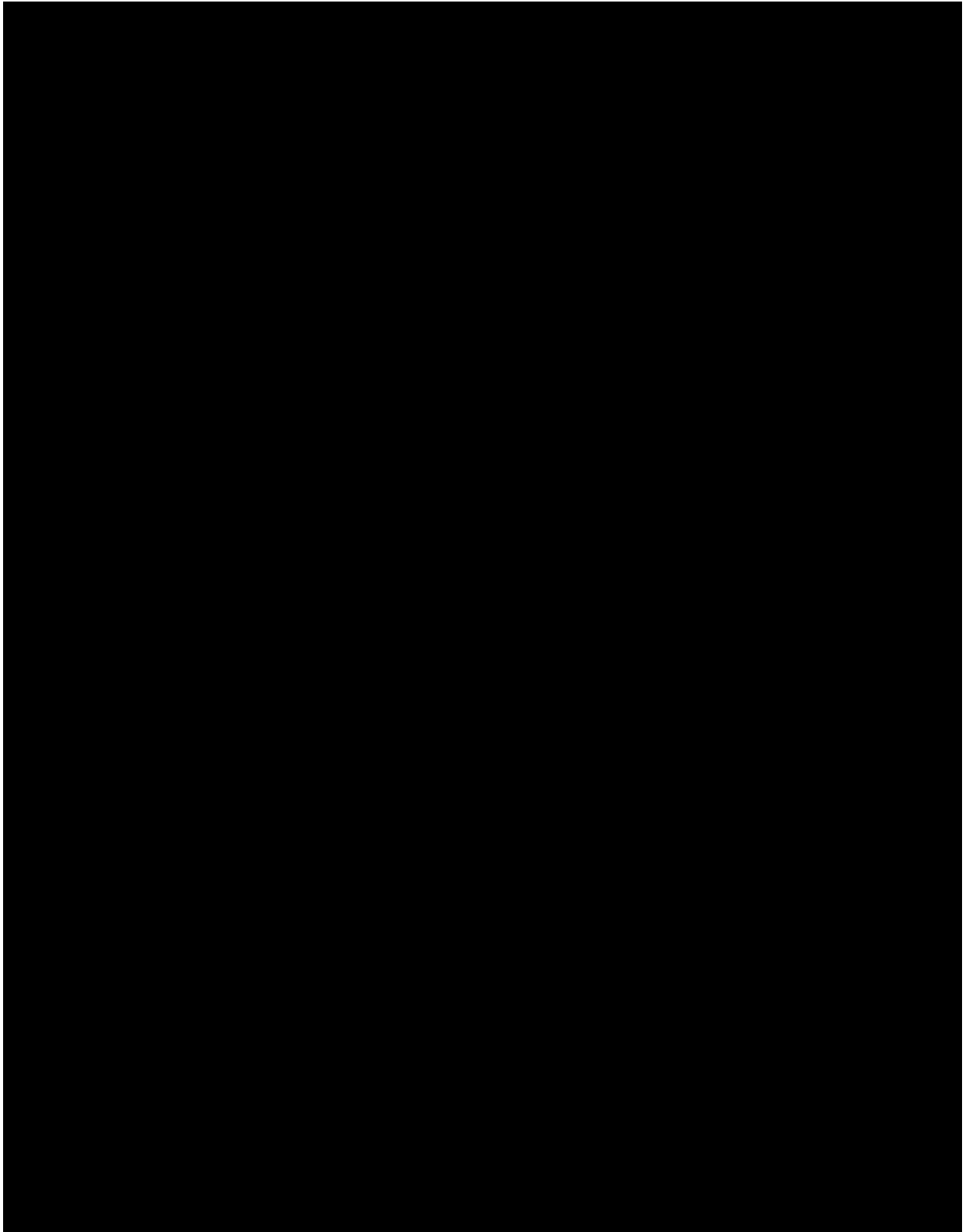
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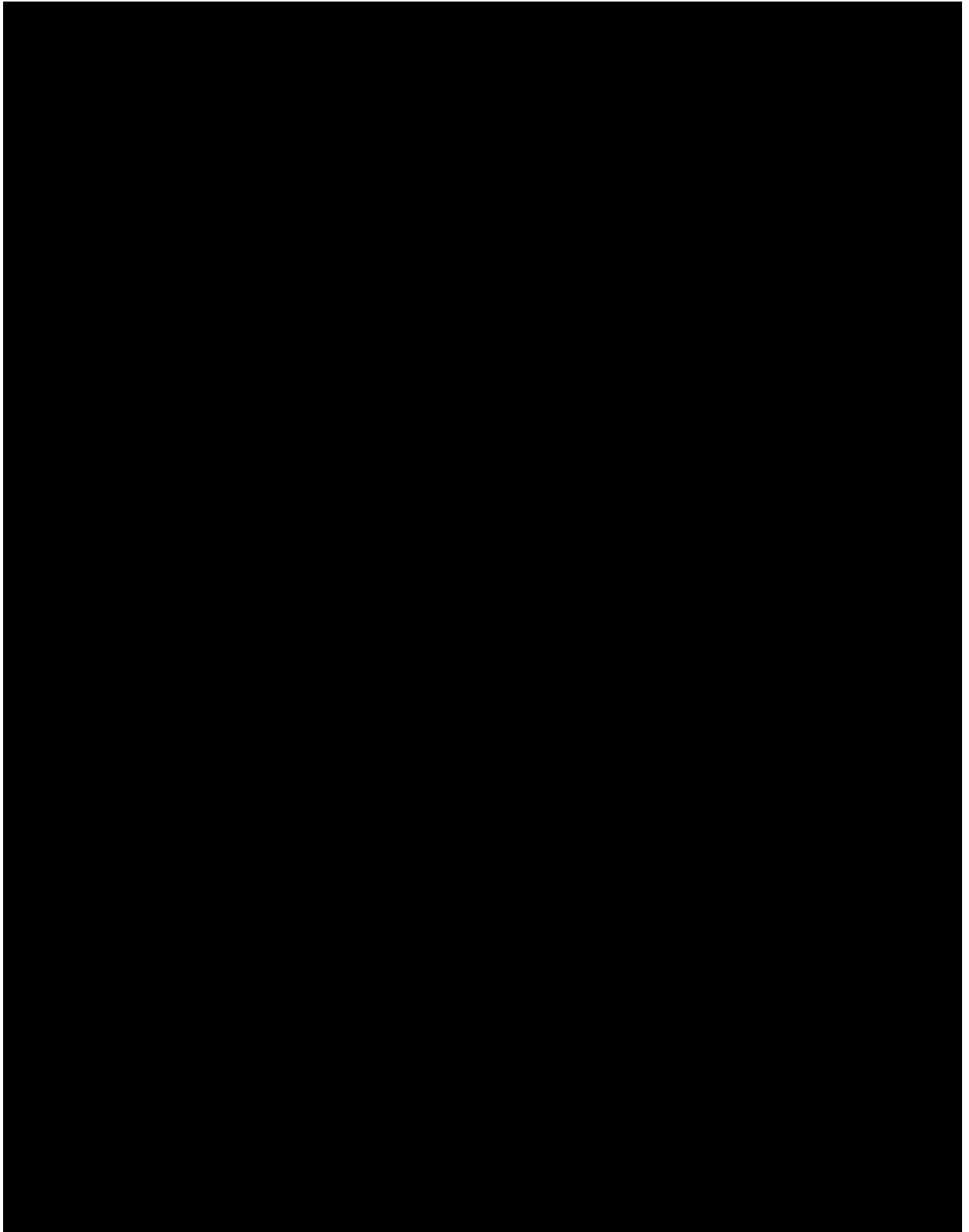
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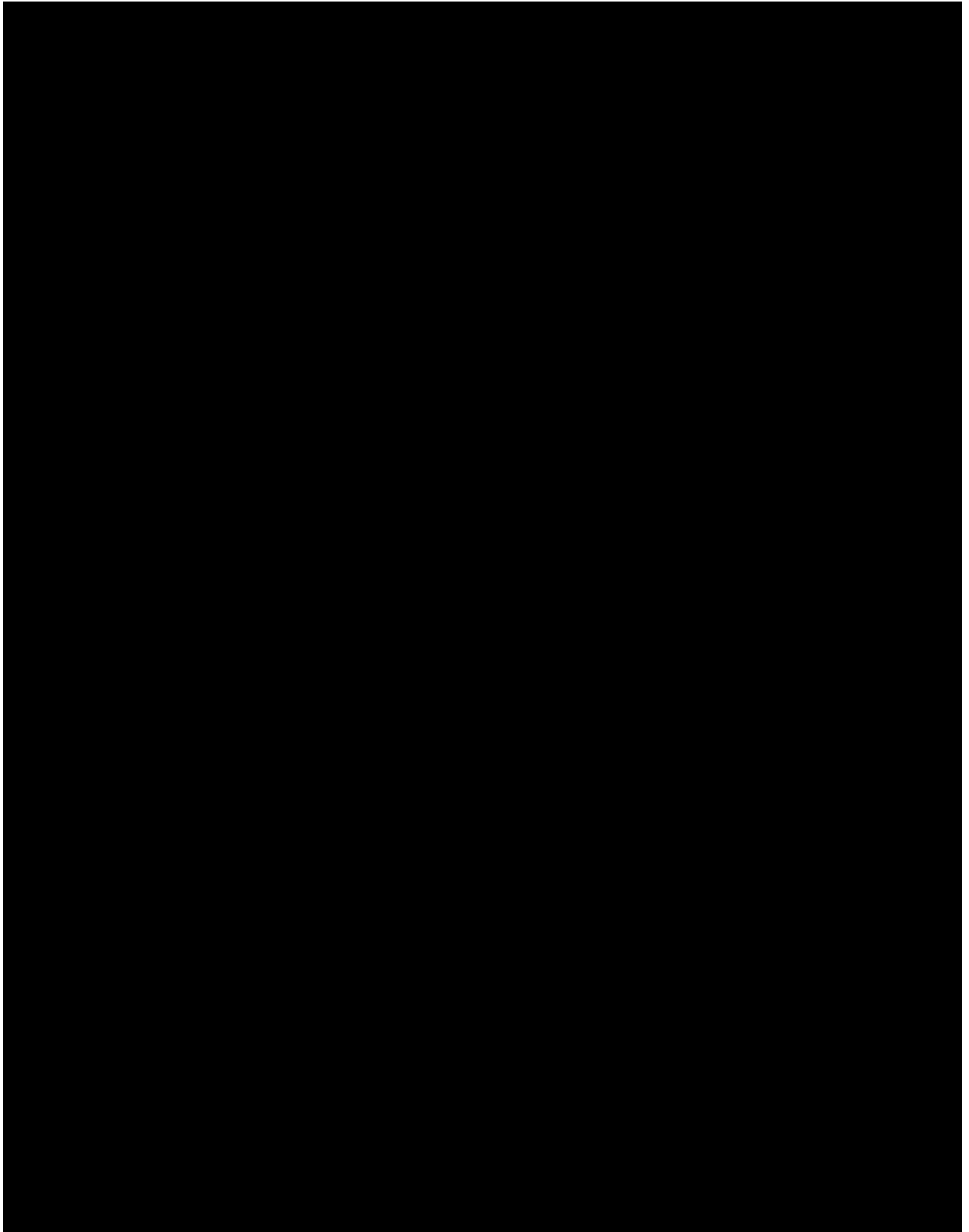
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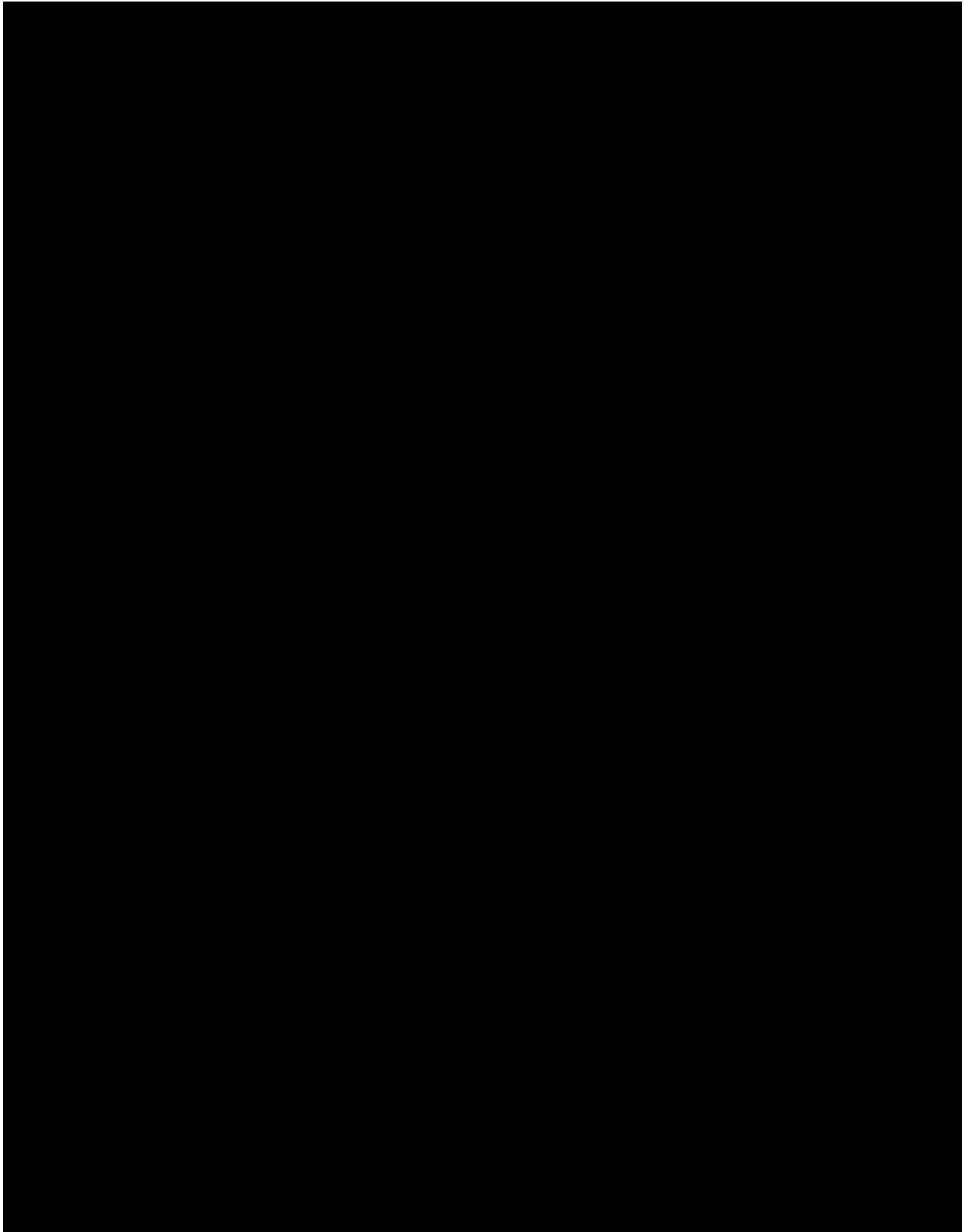
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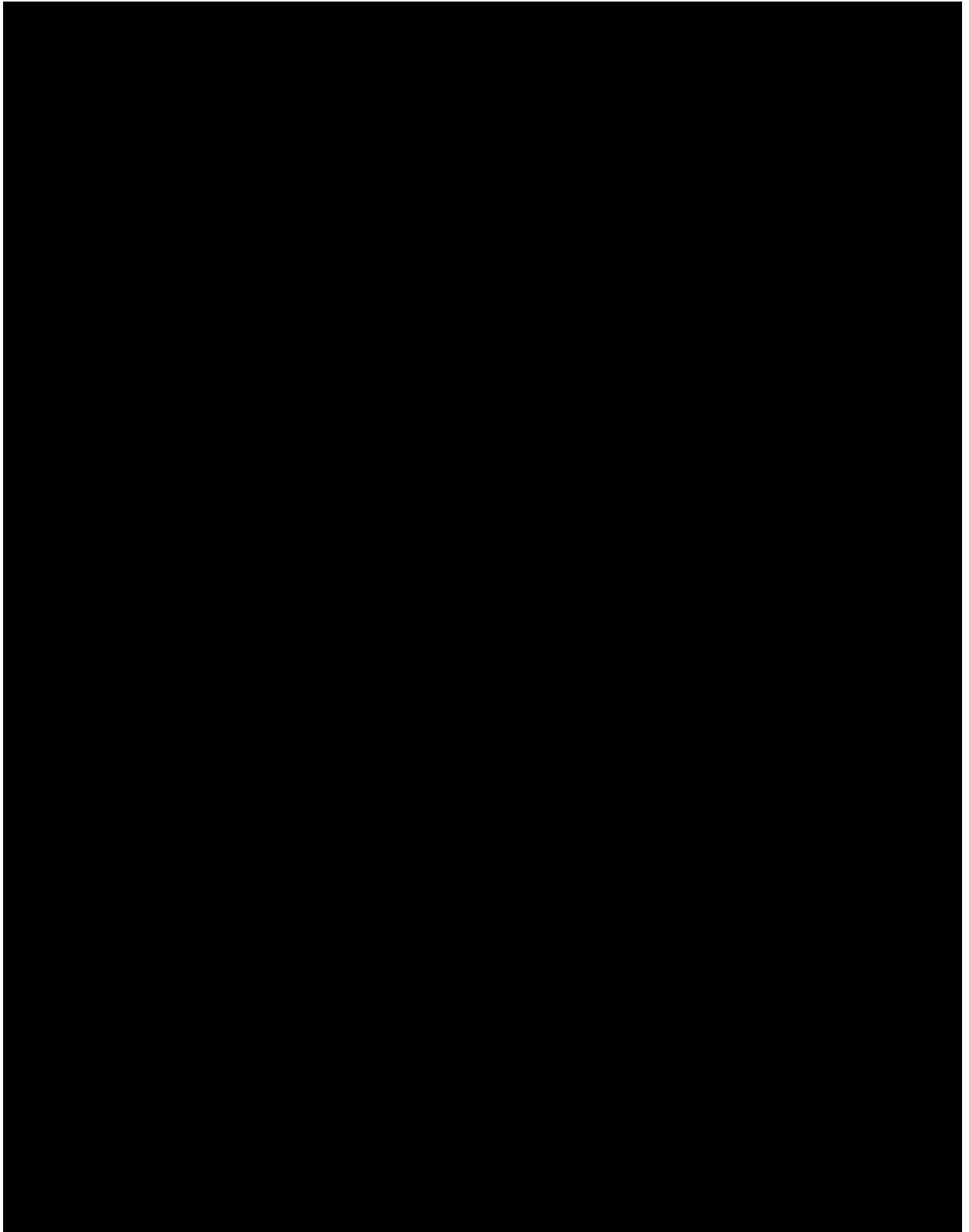
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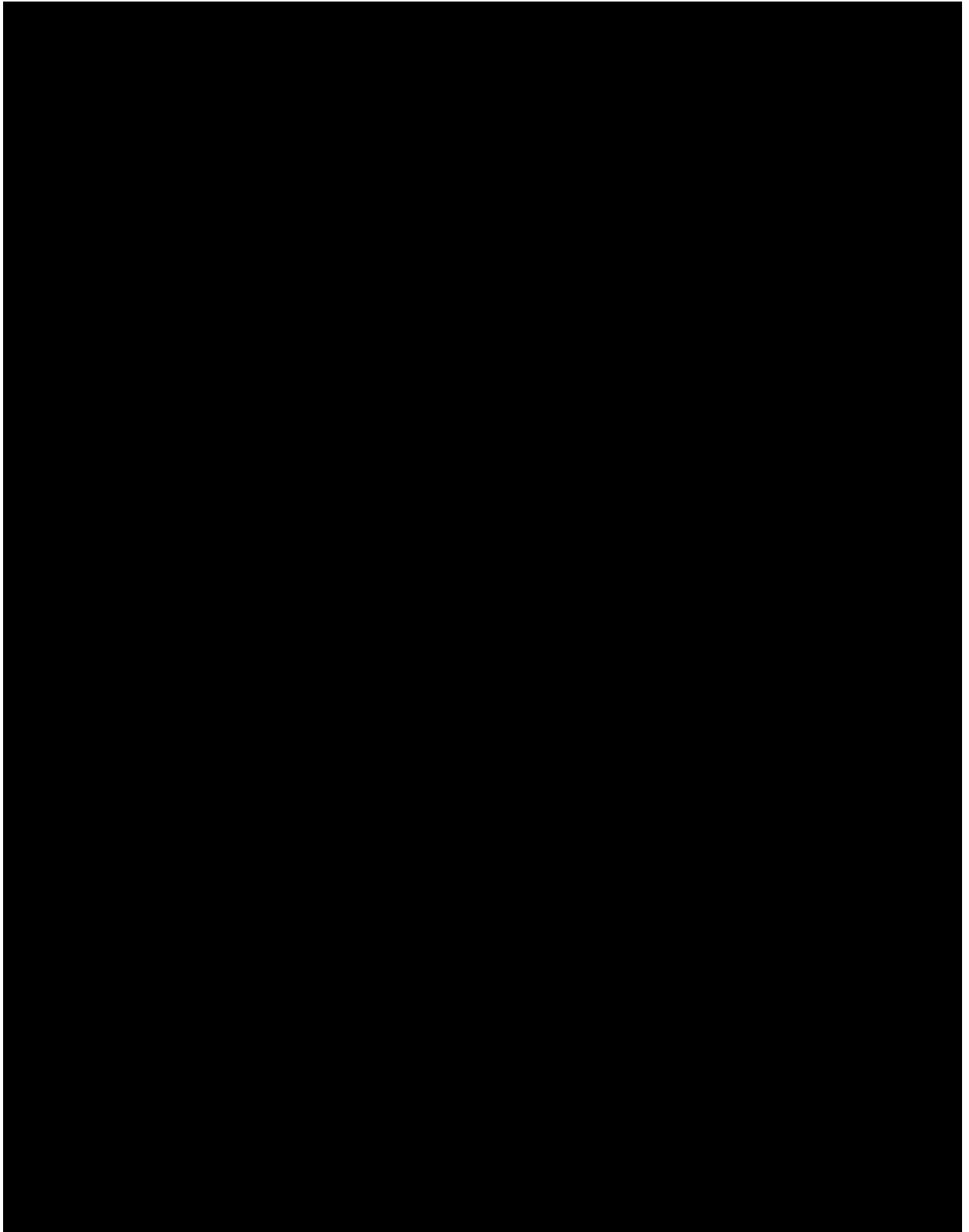
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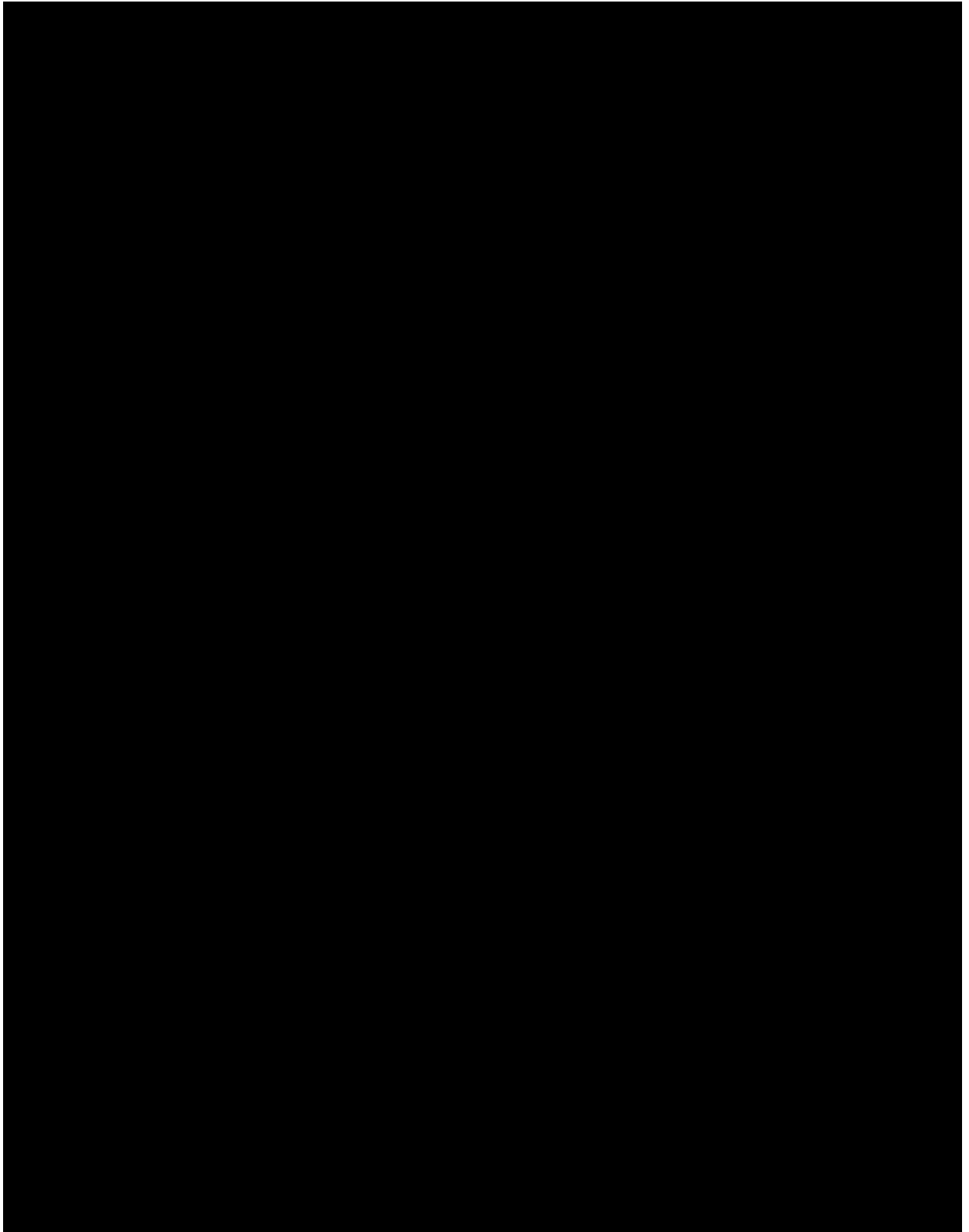
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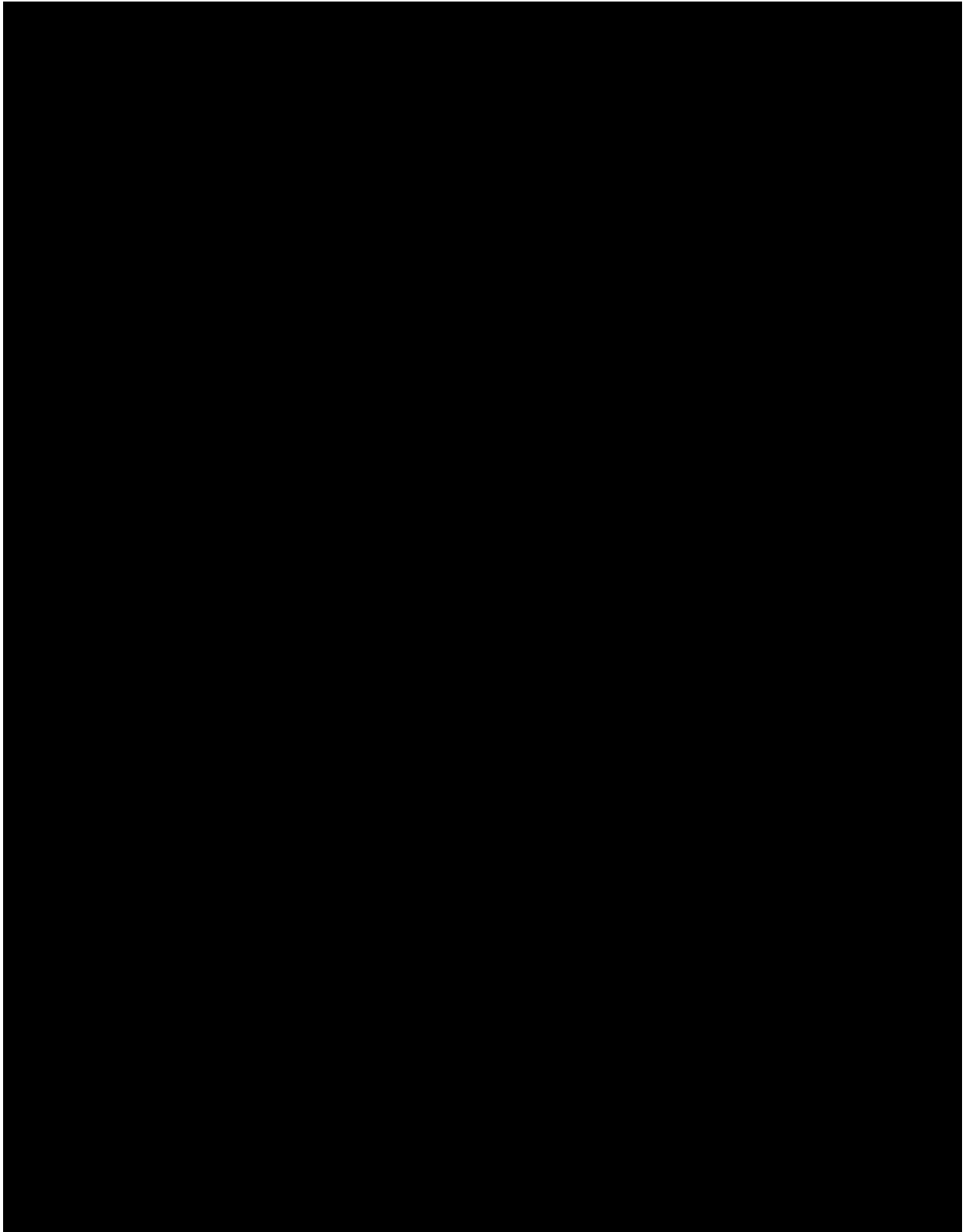
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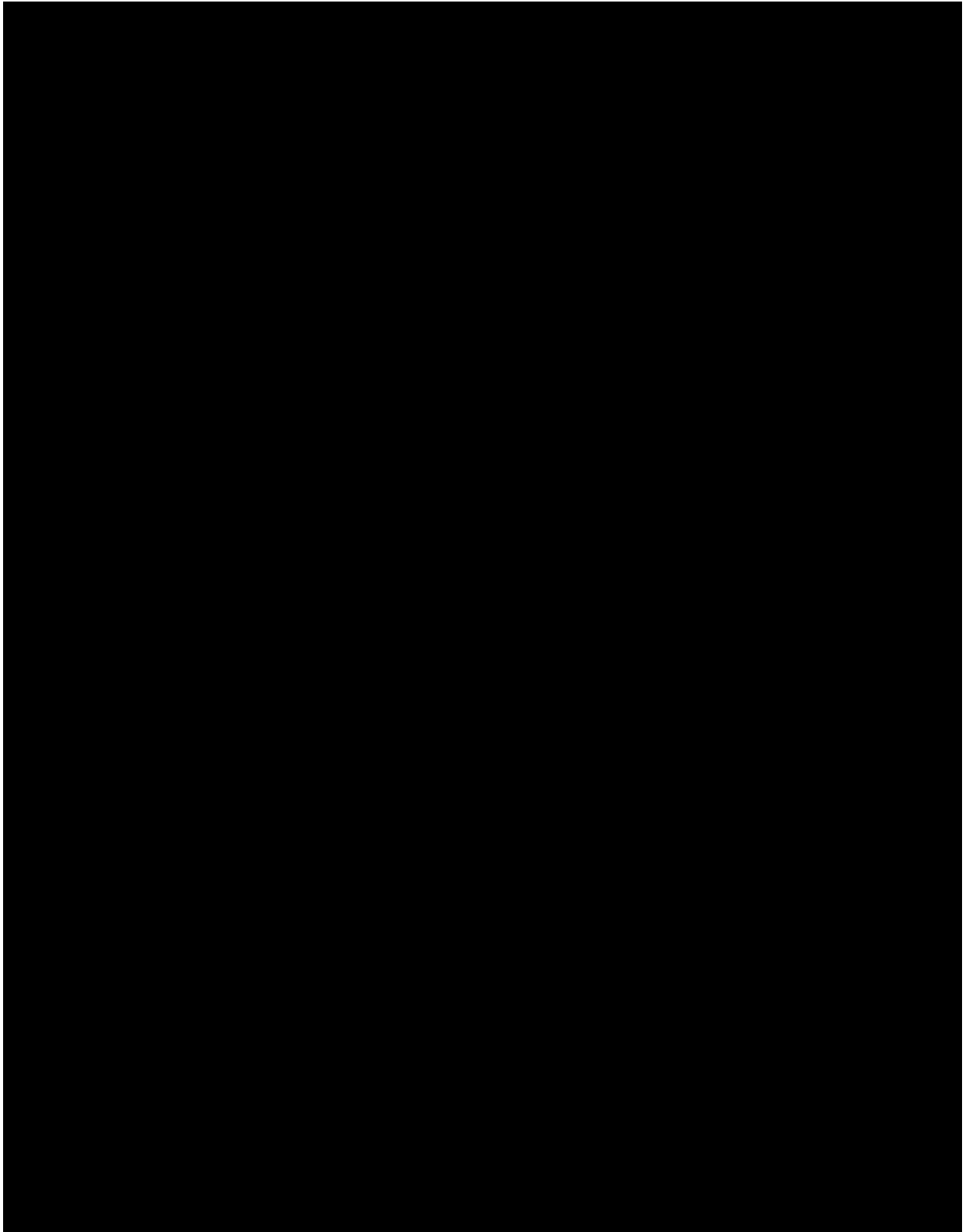
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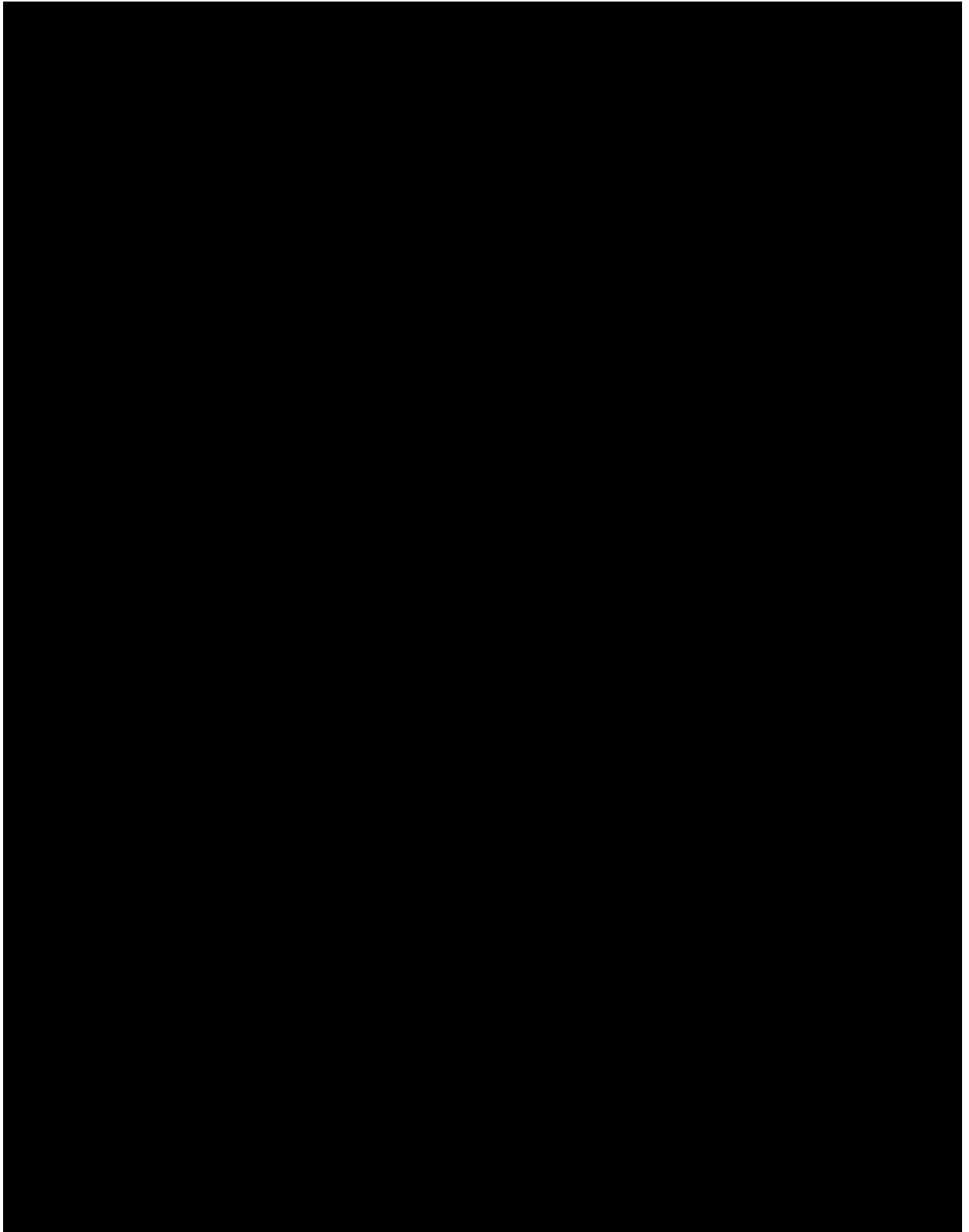
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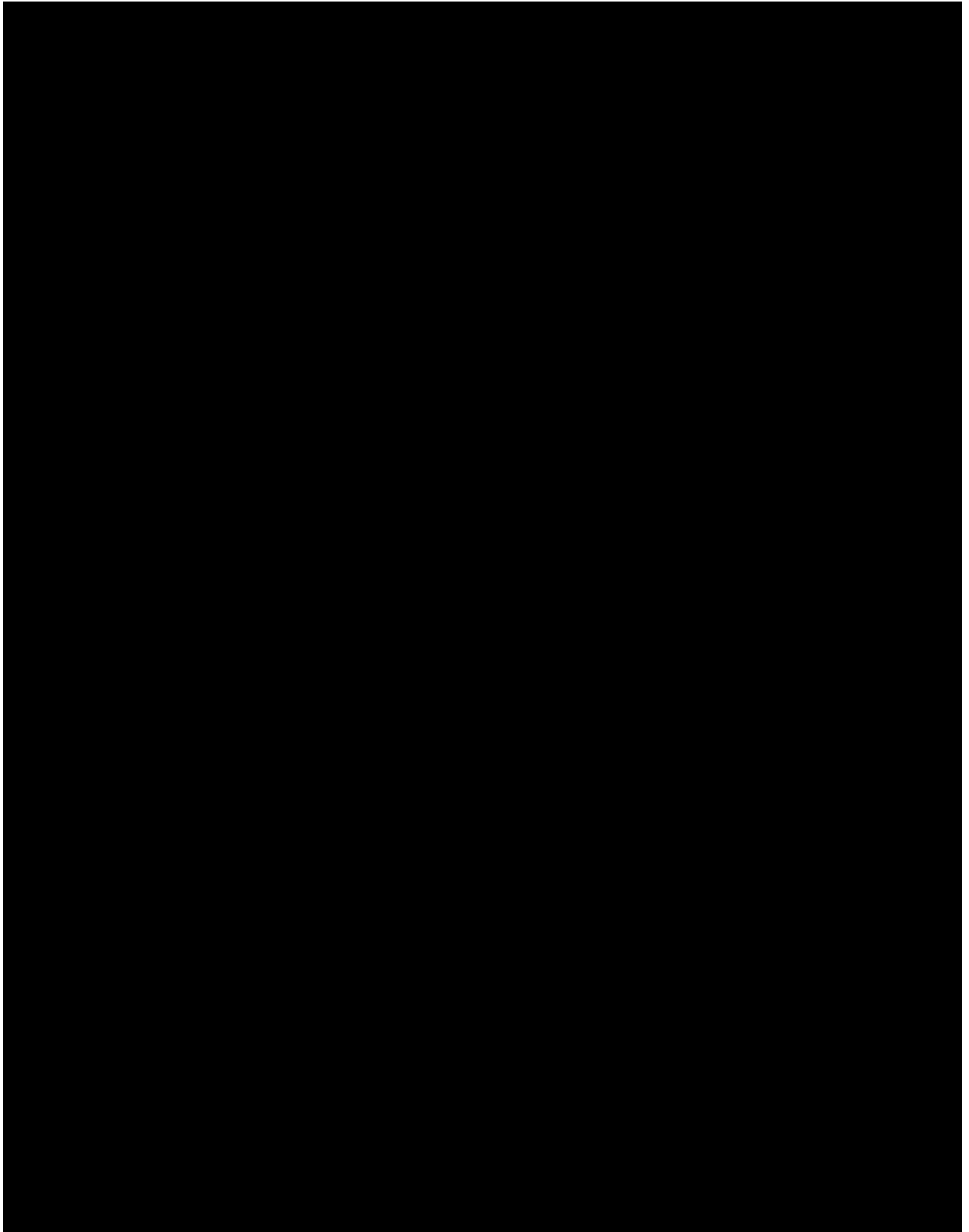
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██████████ - Individual

Intuit, Inc.

11/15/2022

1 STATE OF TENNESSEE)
2 COUNTY OF DAVIDSON) SS:

3 I, Gary Schneider, TLCR No. 676, in and
4 for the State of Tennessee, do hereby certify:

5 That, prior to being examined, the
6 witness named in the foregoing deposition was by
7 me duly sworn to testify the truth, the whole
8 truth and nothing but the truth;

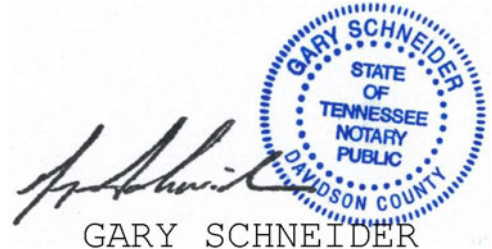
9 That said deposition was taken down by
10 me stenographically at the time and place therein
11 named, and thereafter transcribed via
12 computer-aided transcription under my direction,
13 and the same is a true, correct and complete
14 transcript of said proceedings;

15 Before completion of the deposition,
16 review of the transcript was requested. If
17 requested, any changes made by the deponent (and
18 provided to the reporter) during the period
19 allowed are appended hereto.

20 I further certify that I am not
21 interested in the outcome of the action.

22 Witness my hand this November 28, 2022.

23
24 s/Gary Schneider
25 GARY SCHNEIDER, TLCR No. 676
Certified Shorthand Reporter



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██████████ - Individual

Intuit, Inc.

11/15/2022

1 E R R A T A

2

3 I, ██████████, having read the
4 foregoing deposition, Pages 4 through 157, taken
5 November 15, 2022, do hereby certify said
6 testimony is a true and accurate transcript, with
7 the following changes, if any:

6	PAGE	LINE	SHOULD HAVE BEEN	REASON
7	_____	_____	_____	_____
8	_____	_____	_____	_____
9	_____	_____	_____	_____
10	_____	_____	_____	_____
11	_____	_____	_____	_____
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16	_____	_____	_____	_____
17	_____	_____	_____	_____
18			_____	

19 ██████████

20

21

22 _____
Notary Public
23 My commission expires: _____

24

25

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FEDERAL TRADE COMMISSION

In the Matter of:)
INTUIT, INC.,) Matter No.
a corporation.) D09408
)
-----)

Wednesday, November 30, 2022

Via Zoom

The above-entitled matter came on for
investigational hearing, pursuant to notice, at
12:00 p.m., Eastern Standard Time.

Reported by: Sally Jo Quade, RPR

Intuit, Inc.

11/30/2022

1 APPEARANCES:

2

3 ON BEHALF OF THE FEDERAL TRADE COMMISSION:

4 SARA TONNESEN, ESQ.

5 JAMES EVANS, ESQ.

6 ROBERTO ANGUIZOLA, ESQ.

7 REBECCA PLETT, ESQ.

8 Federal Trade Commission

9 600 Pennsylvania Avenue, N.W.

10 Washington, DC 20580

11 (202) 326-2026

12 stonnesen@ftc.gov

13

14 ON BEHALF OF INTUIT AND THE WITNESS:

15 DEREK WOODMAN, ESQ.

16 MOLLY DILLAWAY, ESQ.

17 Wilmer Cutler Pickering Hale and Dorr LLP

18 1875 Pennsylvania Avenue, N.W.

19 Washington, DC 20006

20 (202) 663-6980

21 derek.woodman@wilmerhale.com

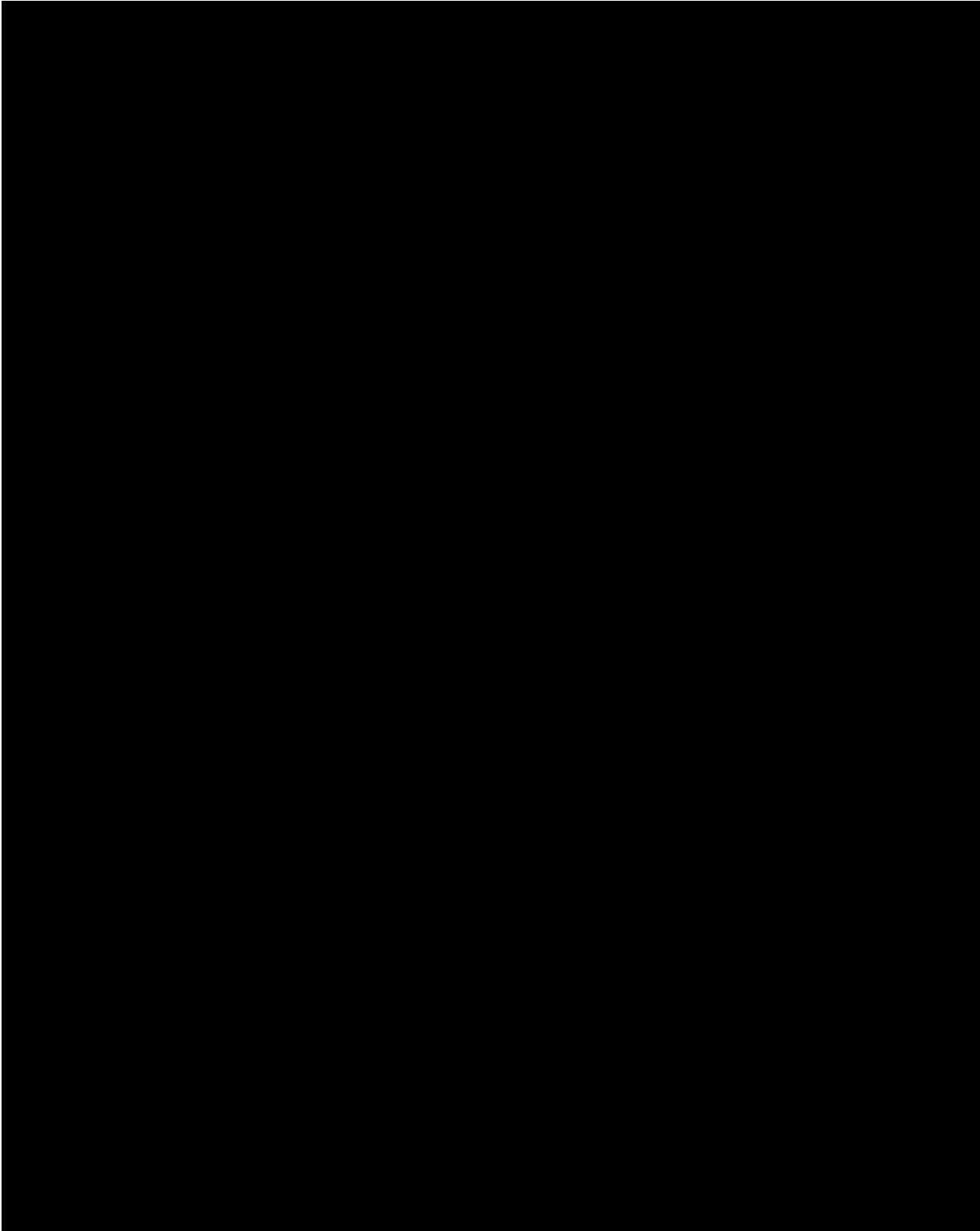
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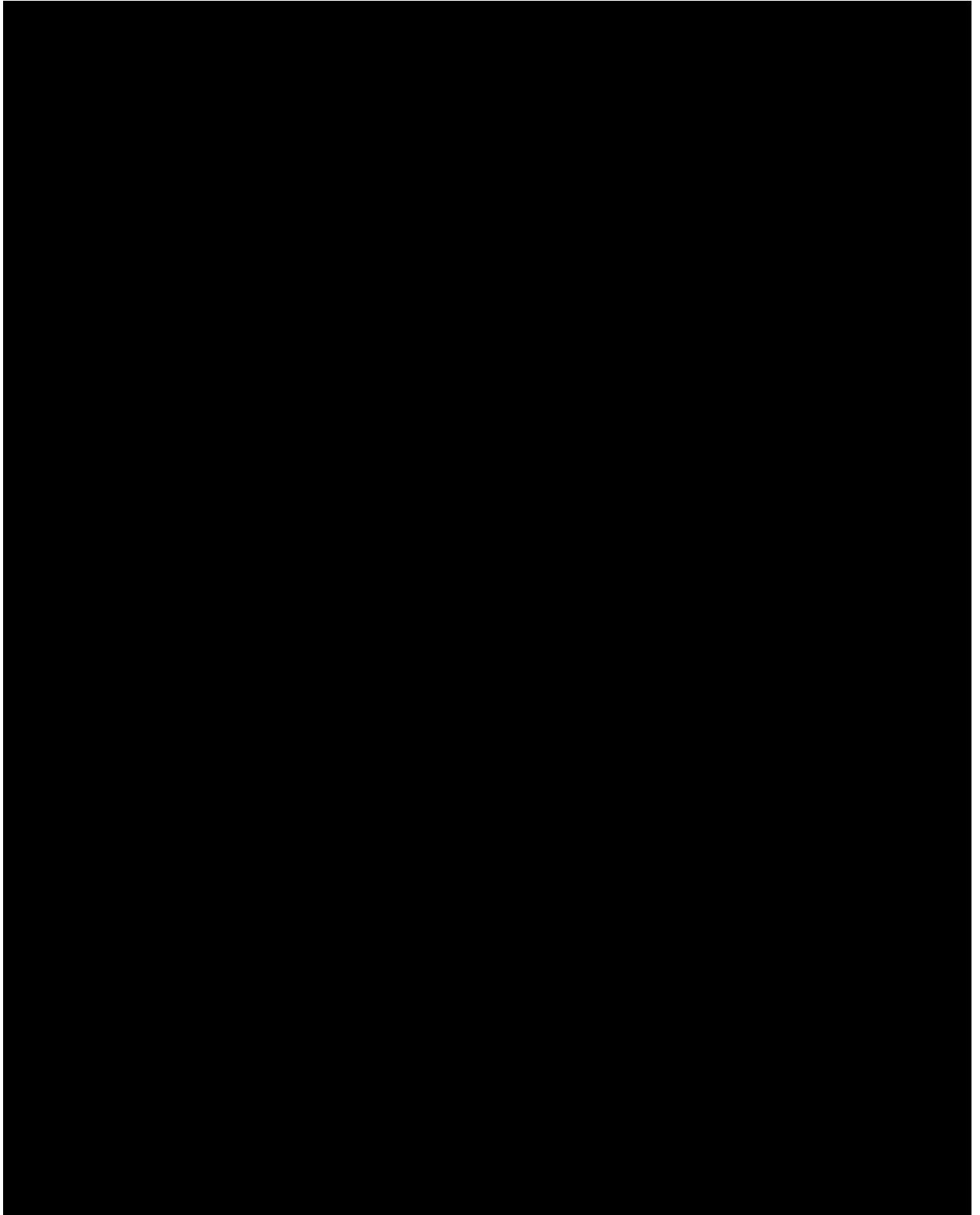
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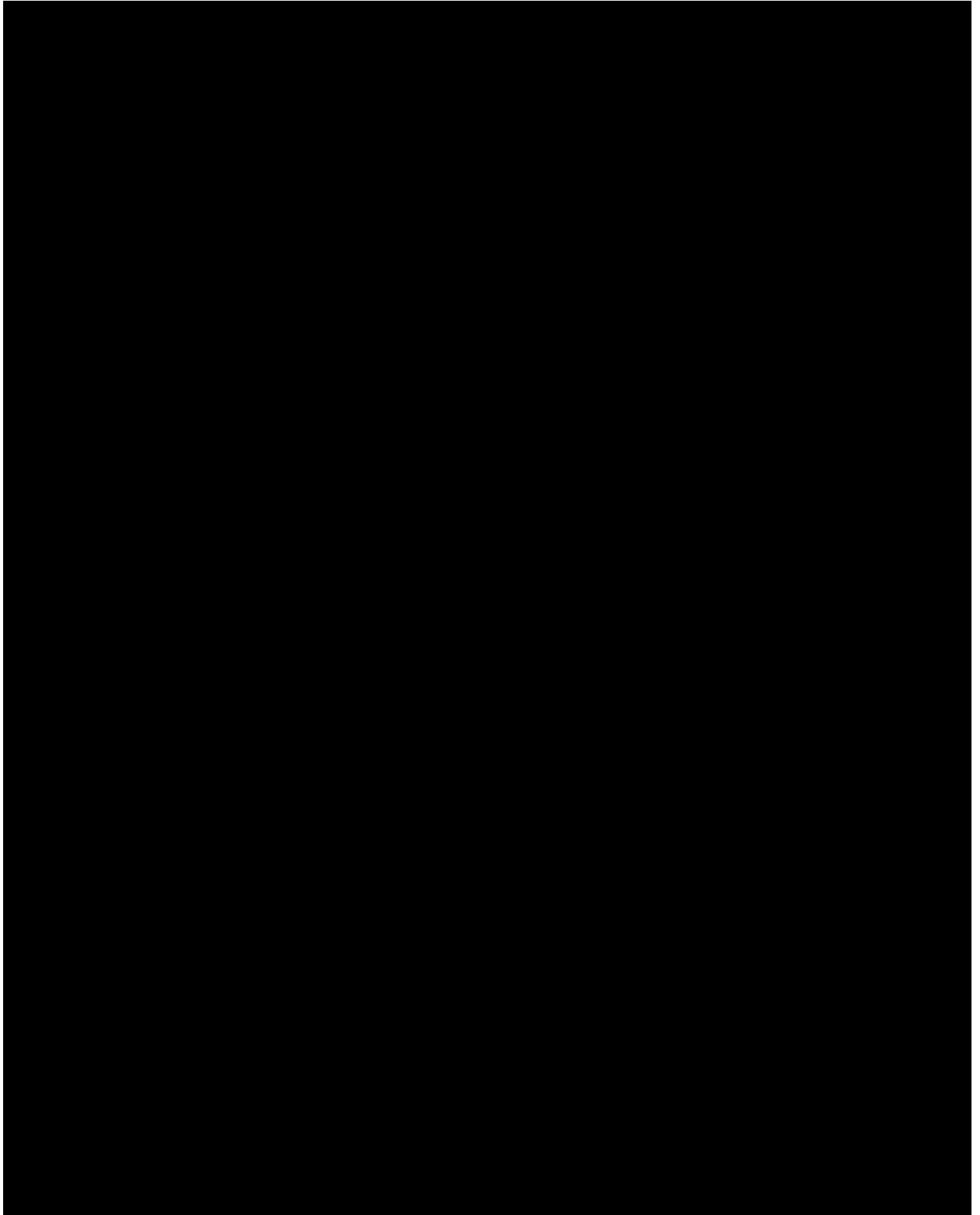
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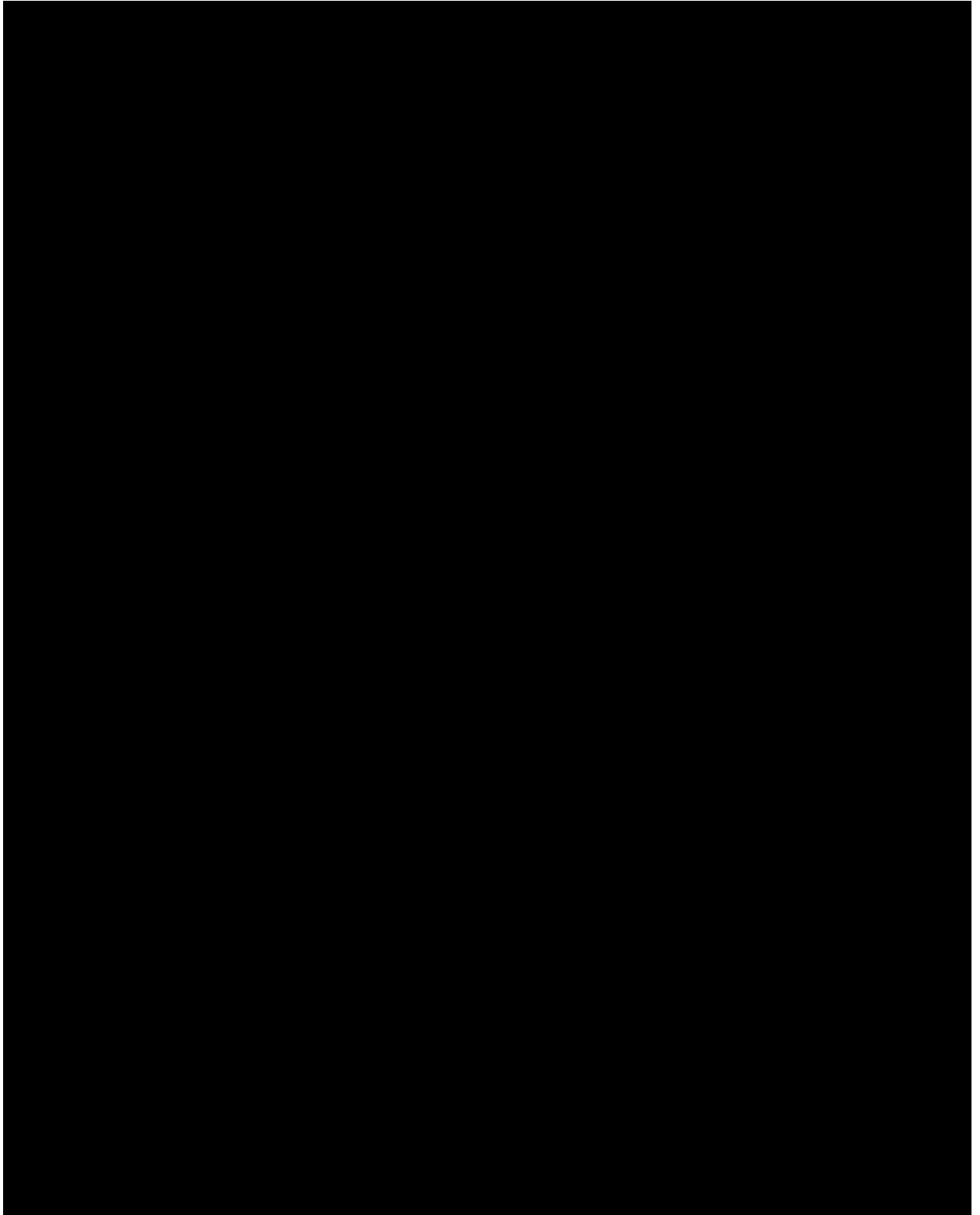
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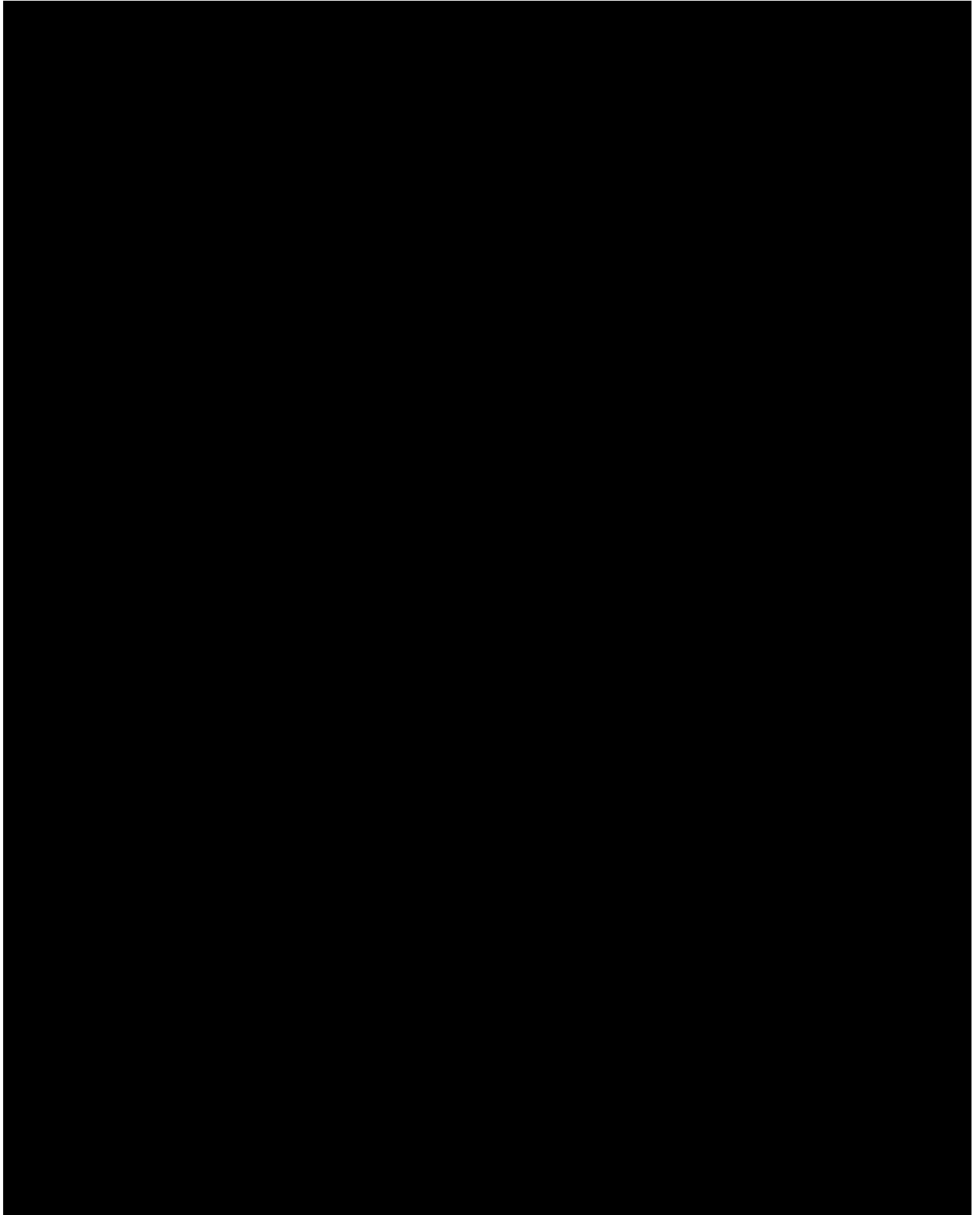
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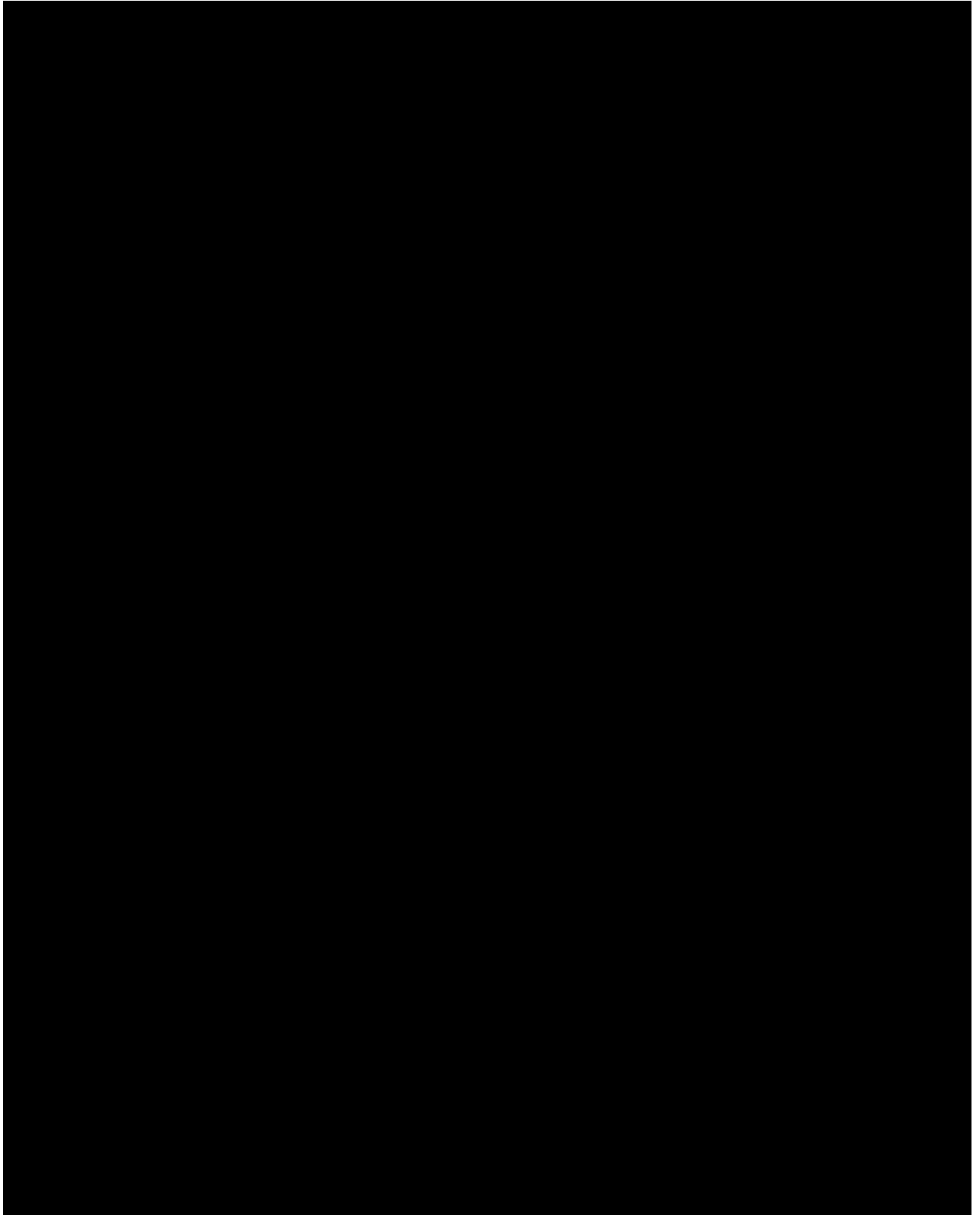
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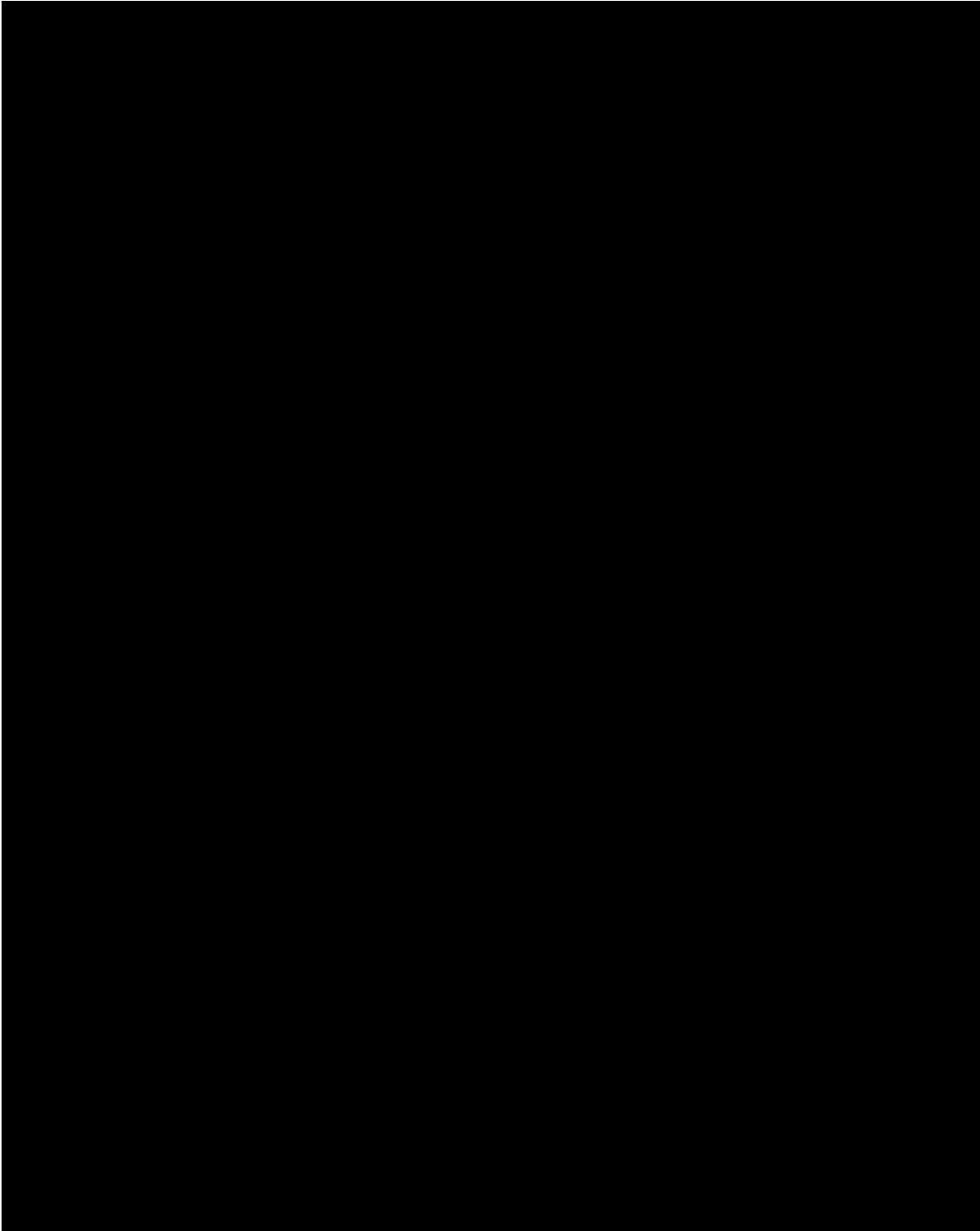
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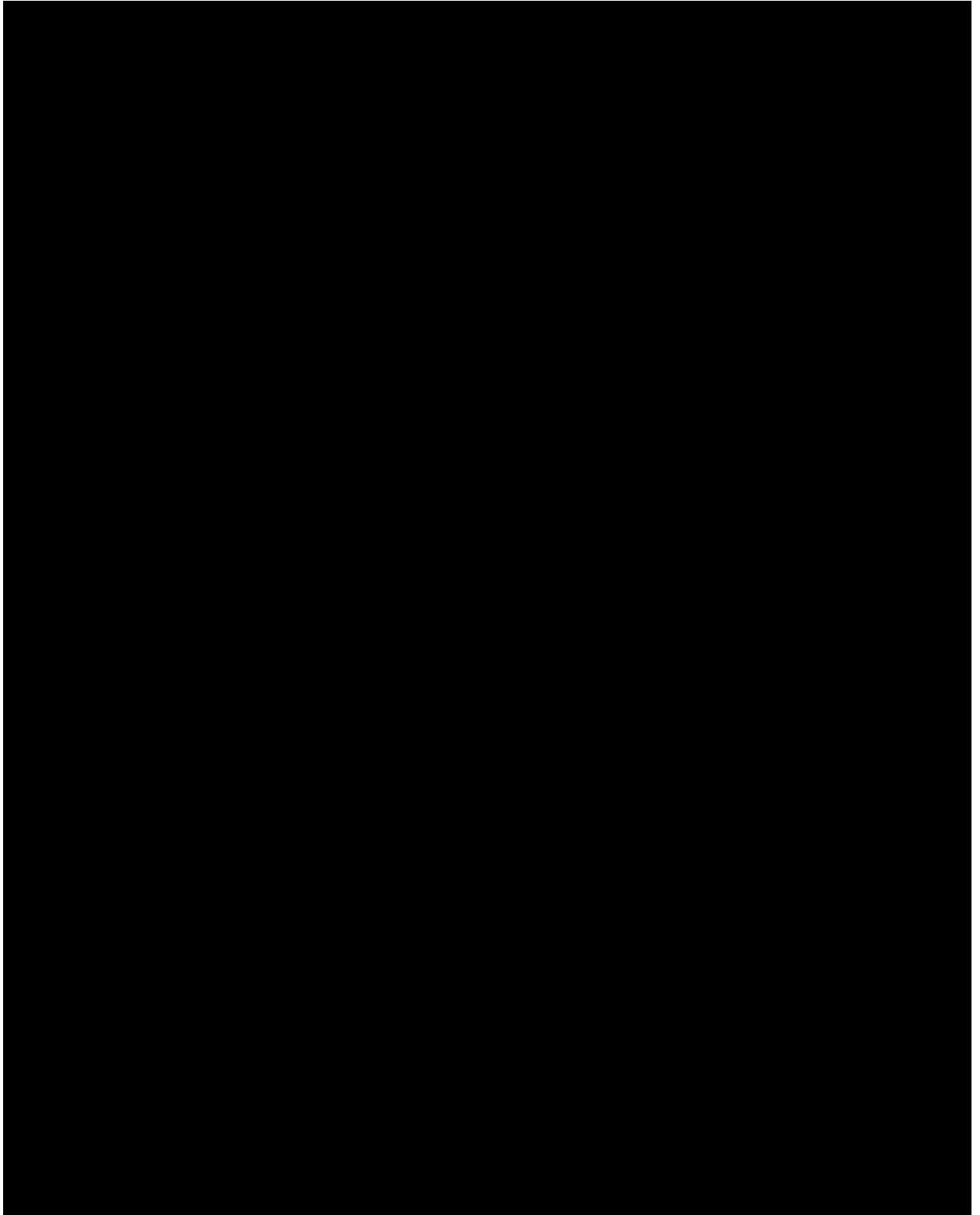
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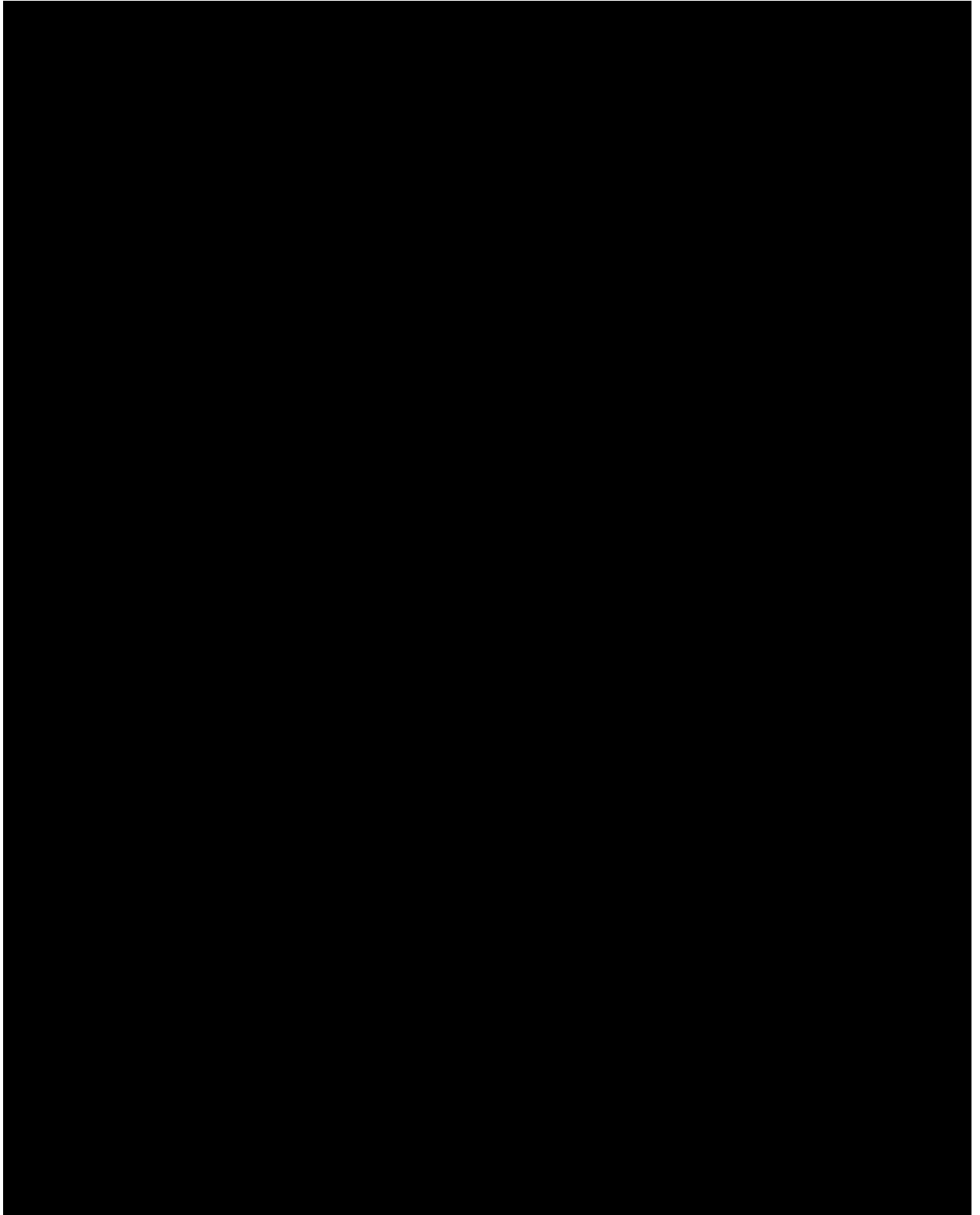
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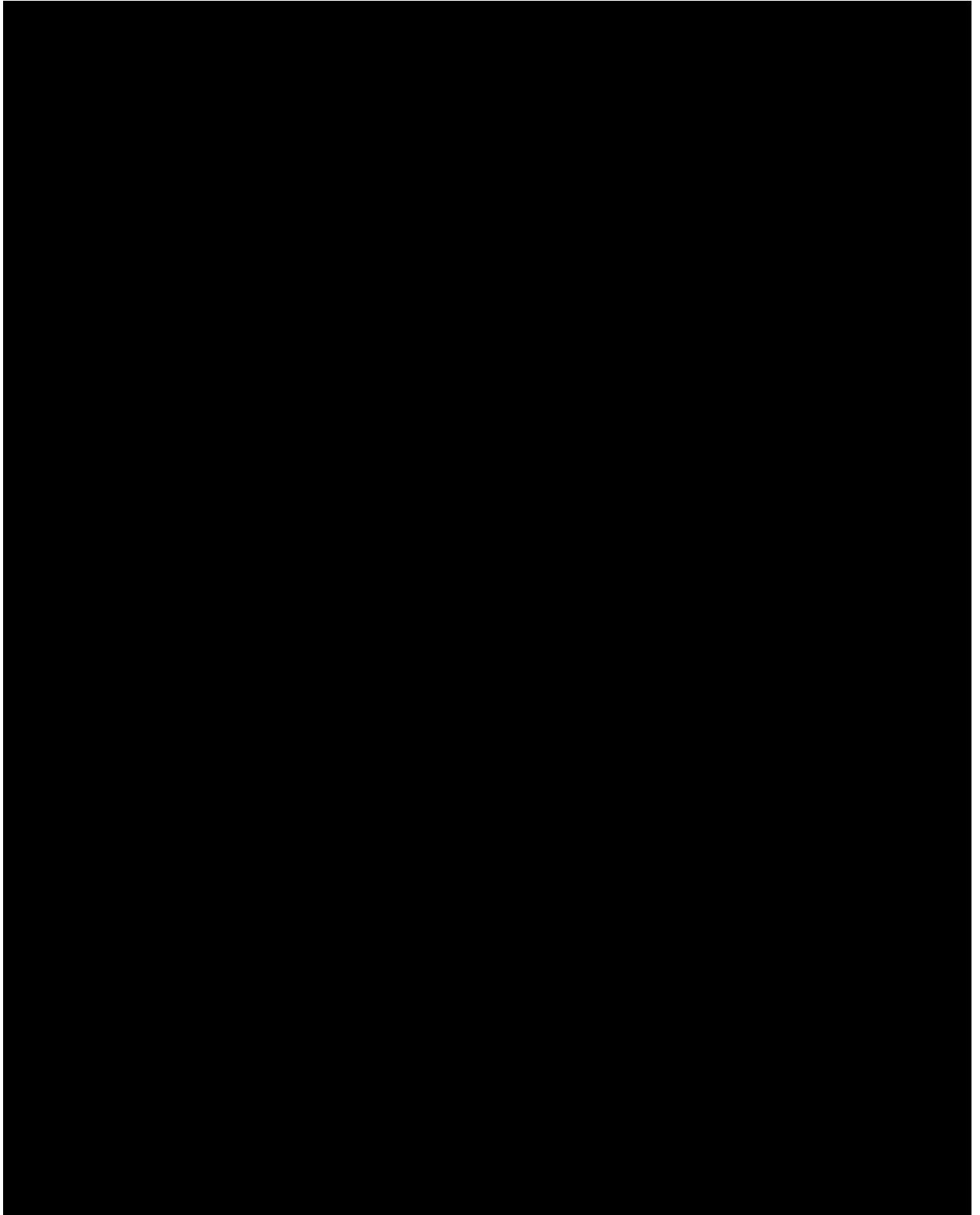
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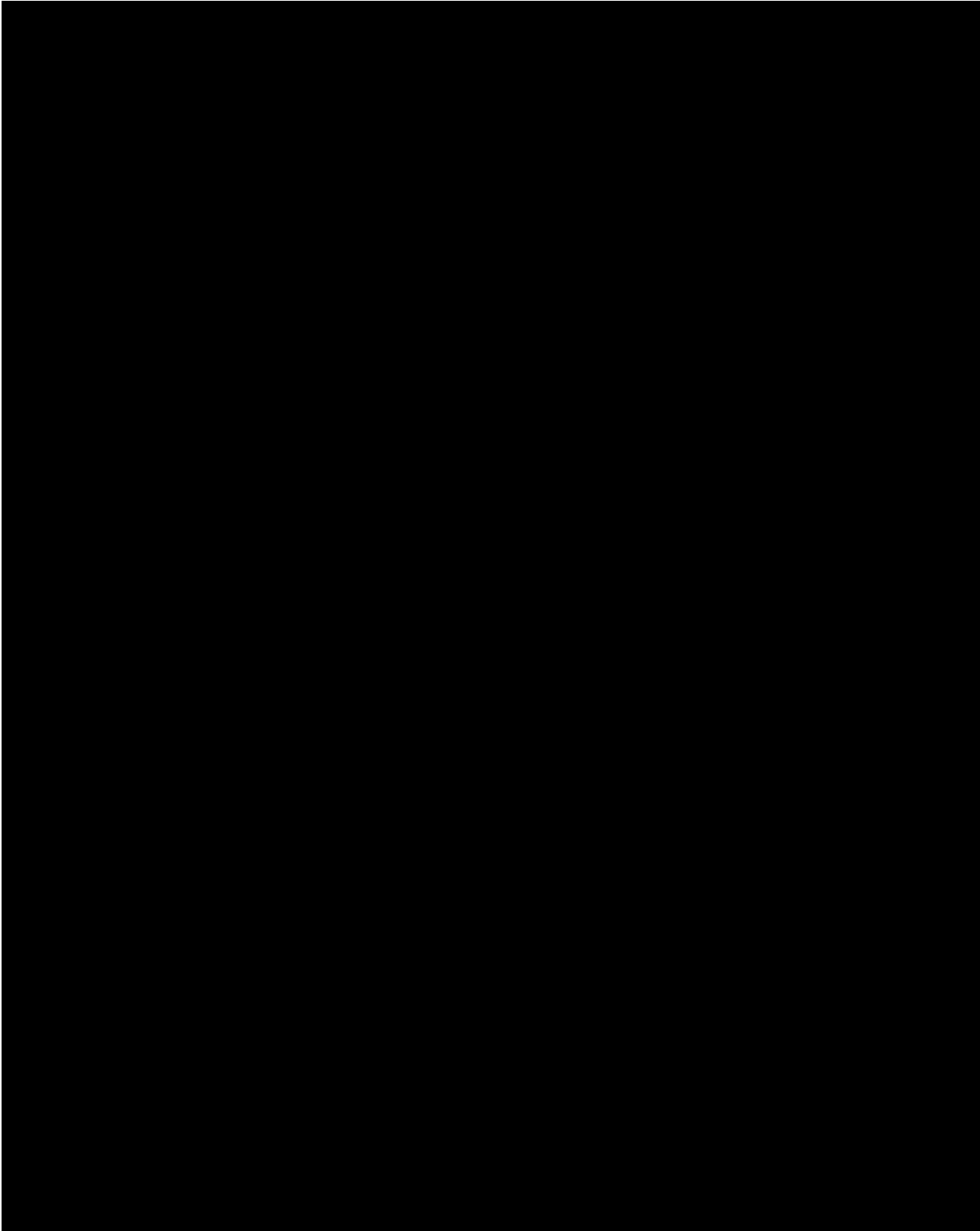
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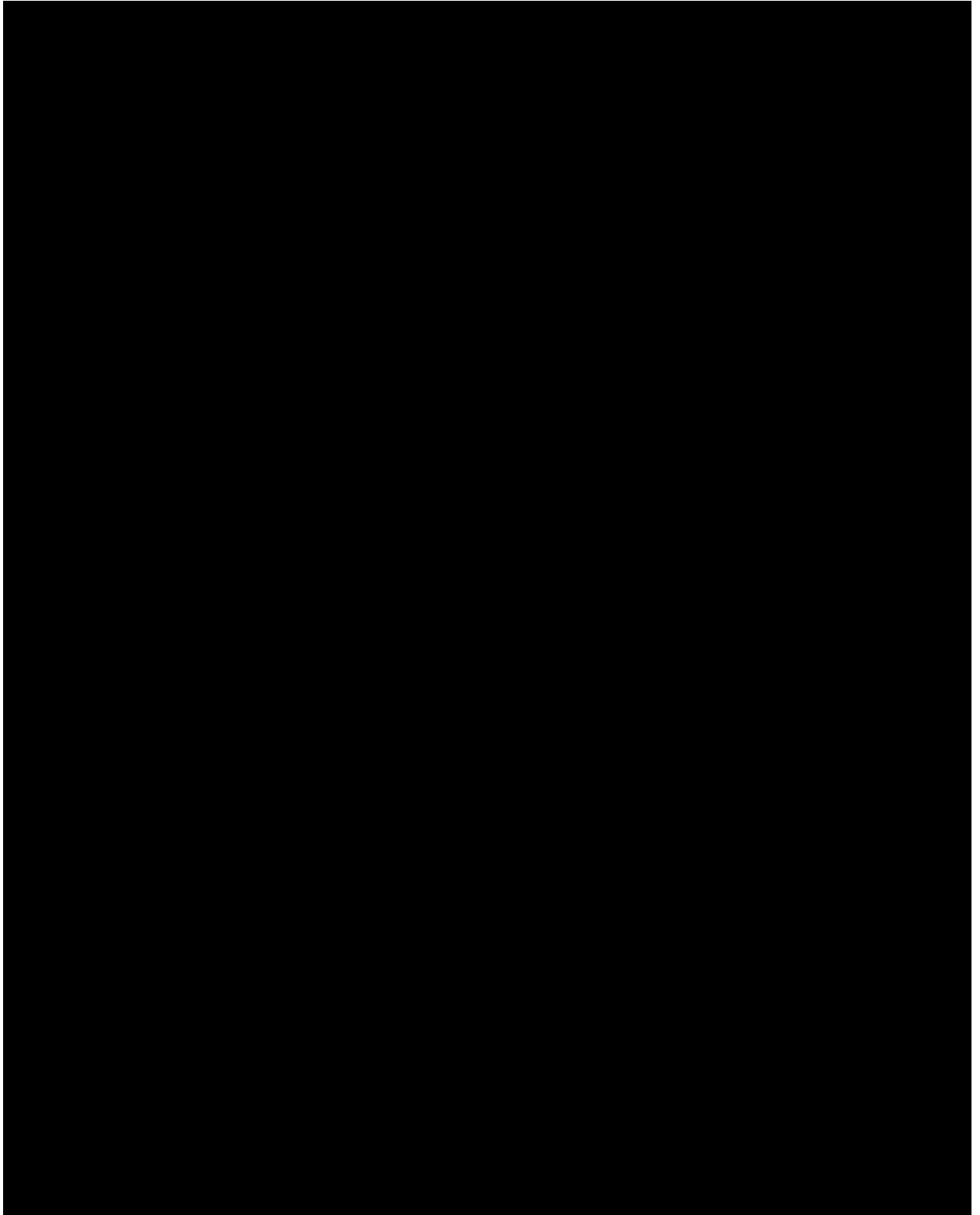
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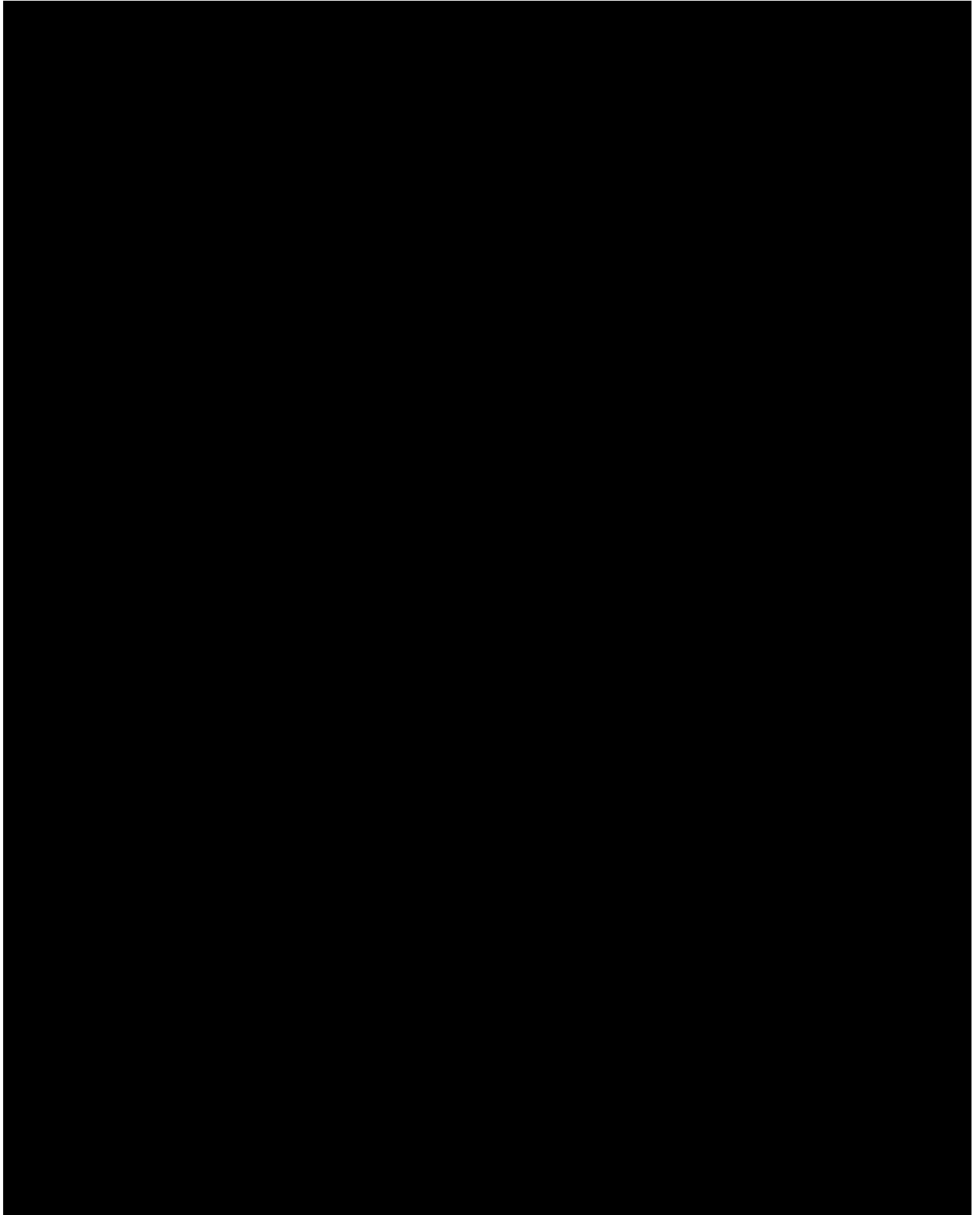
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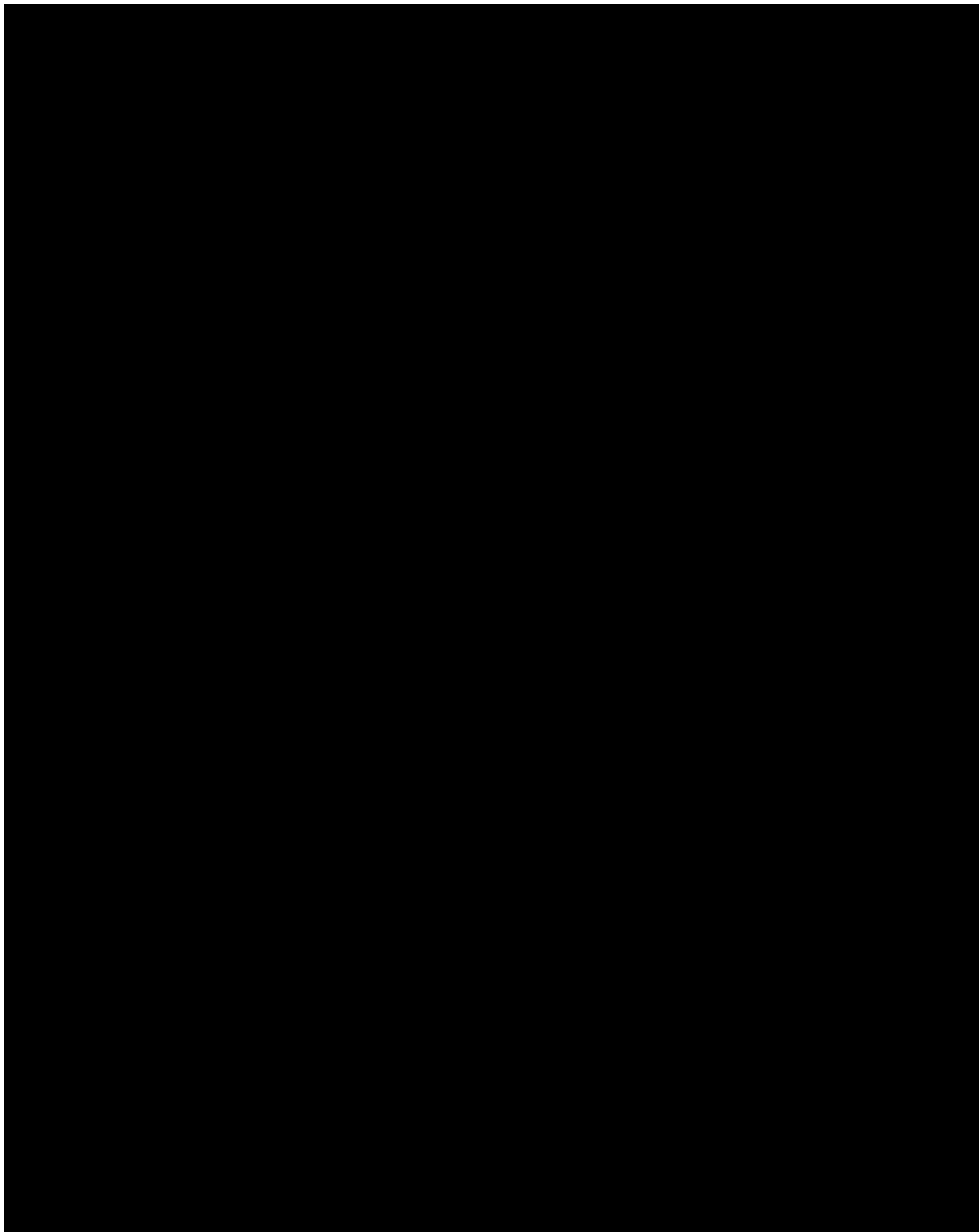
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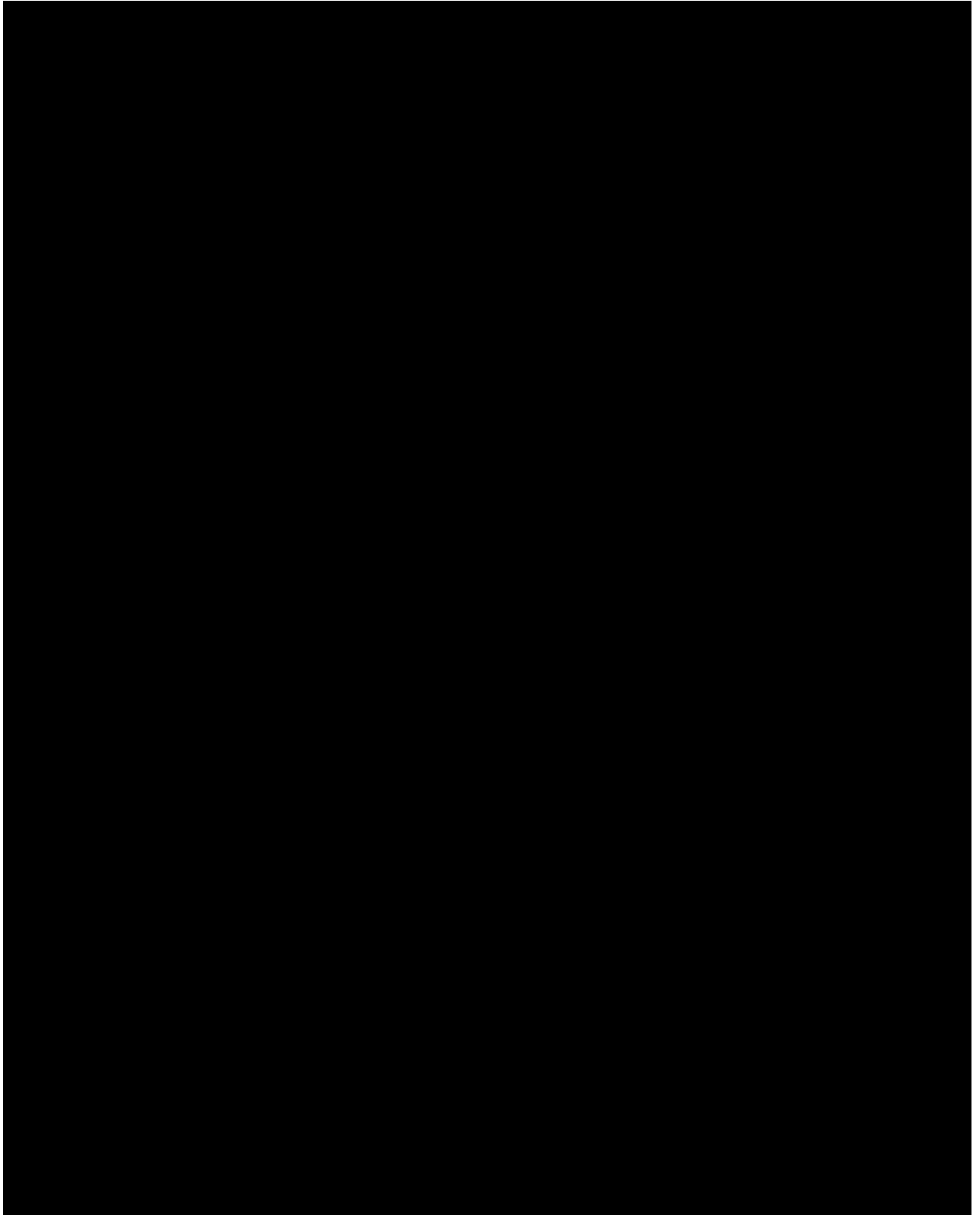
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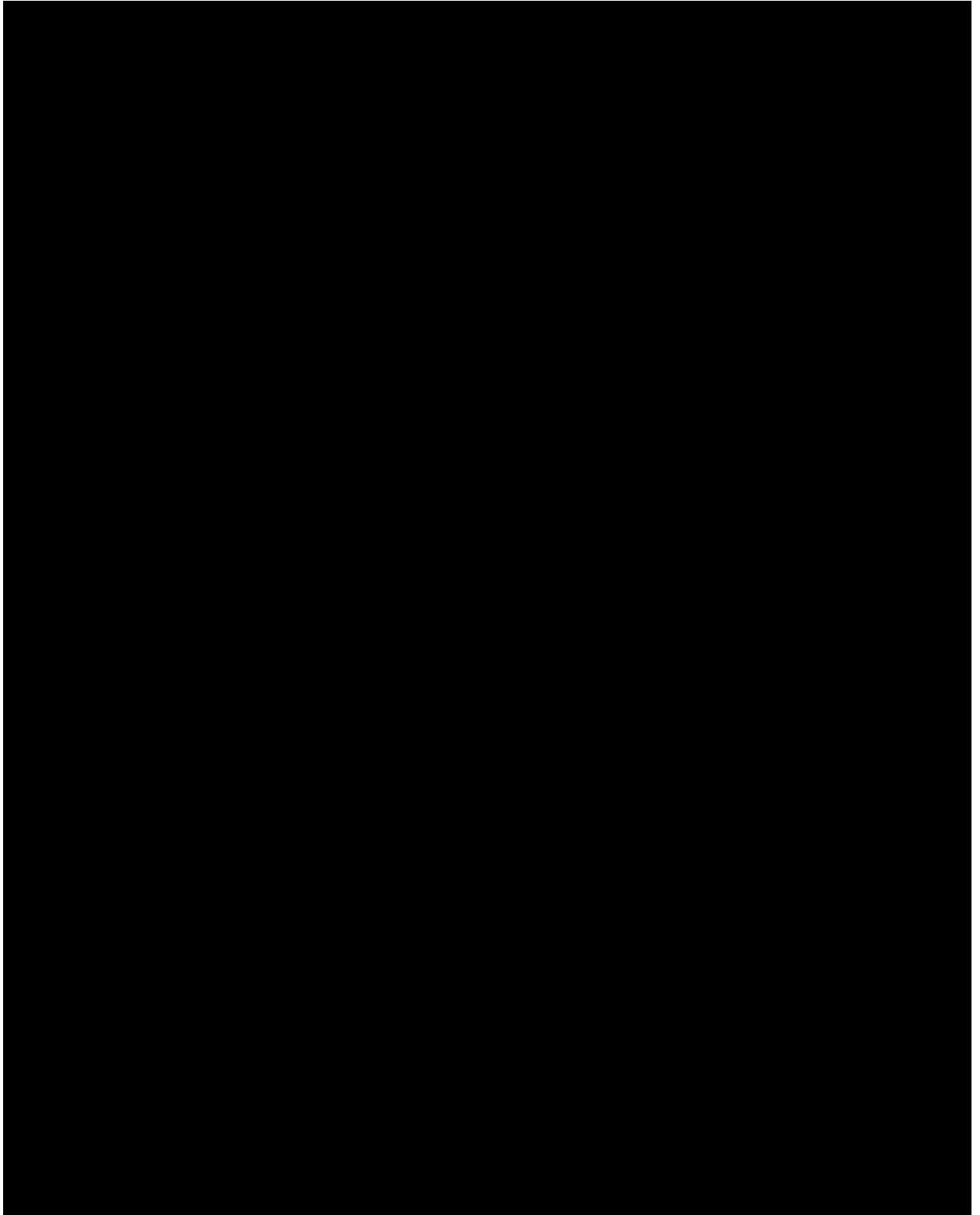
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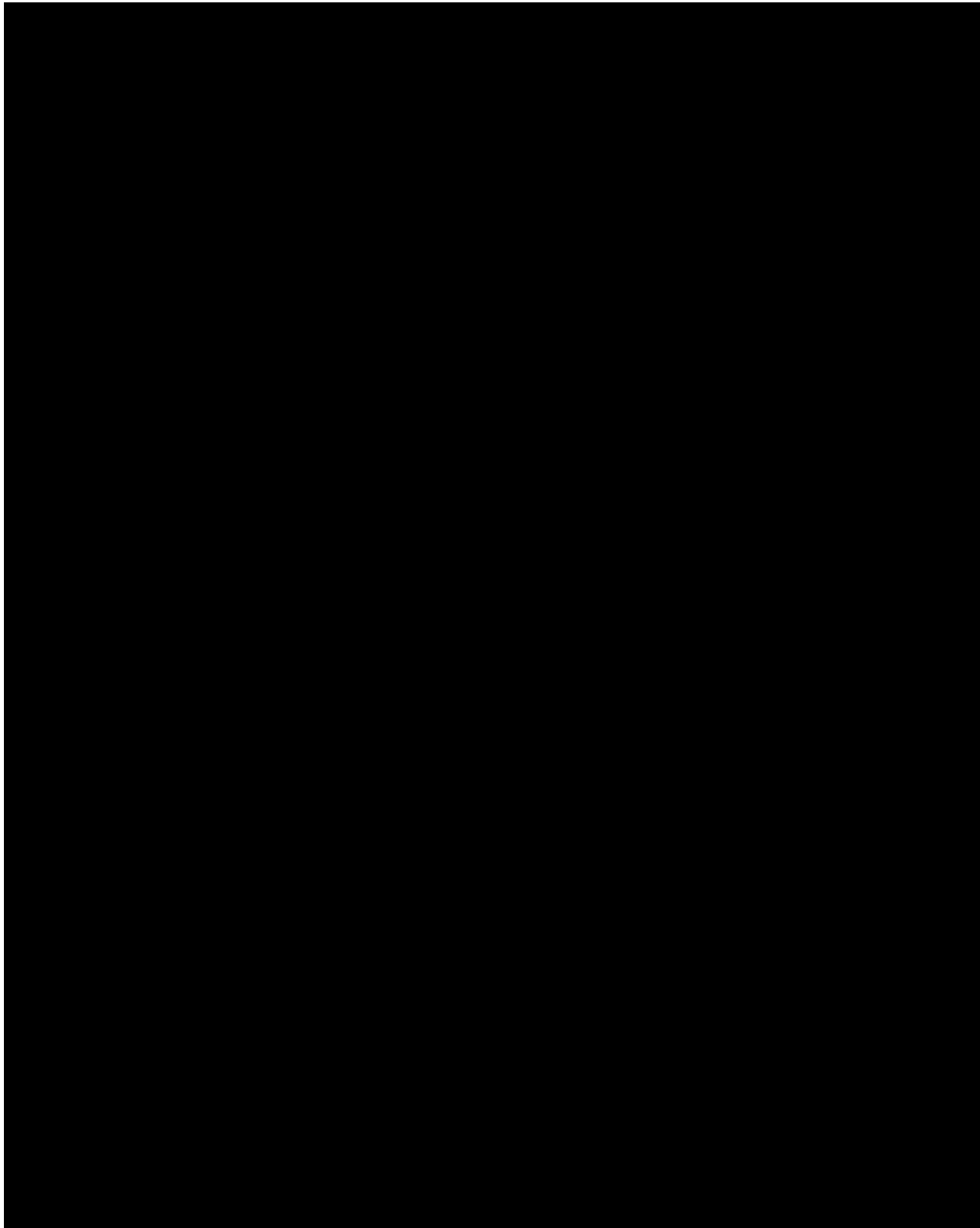
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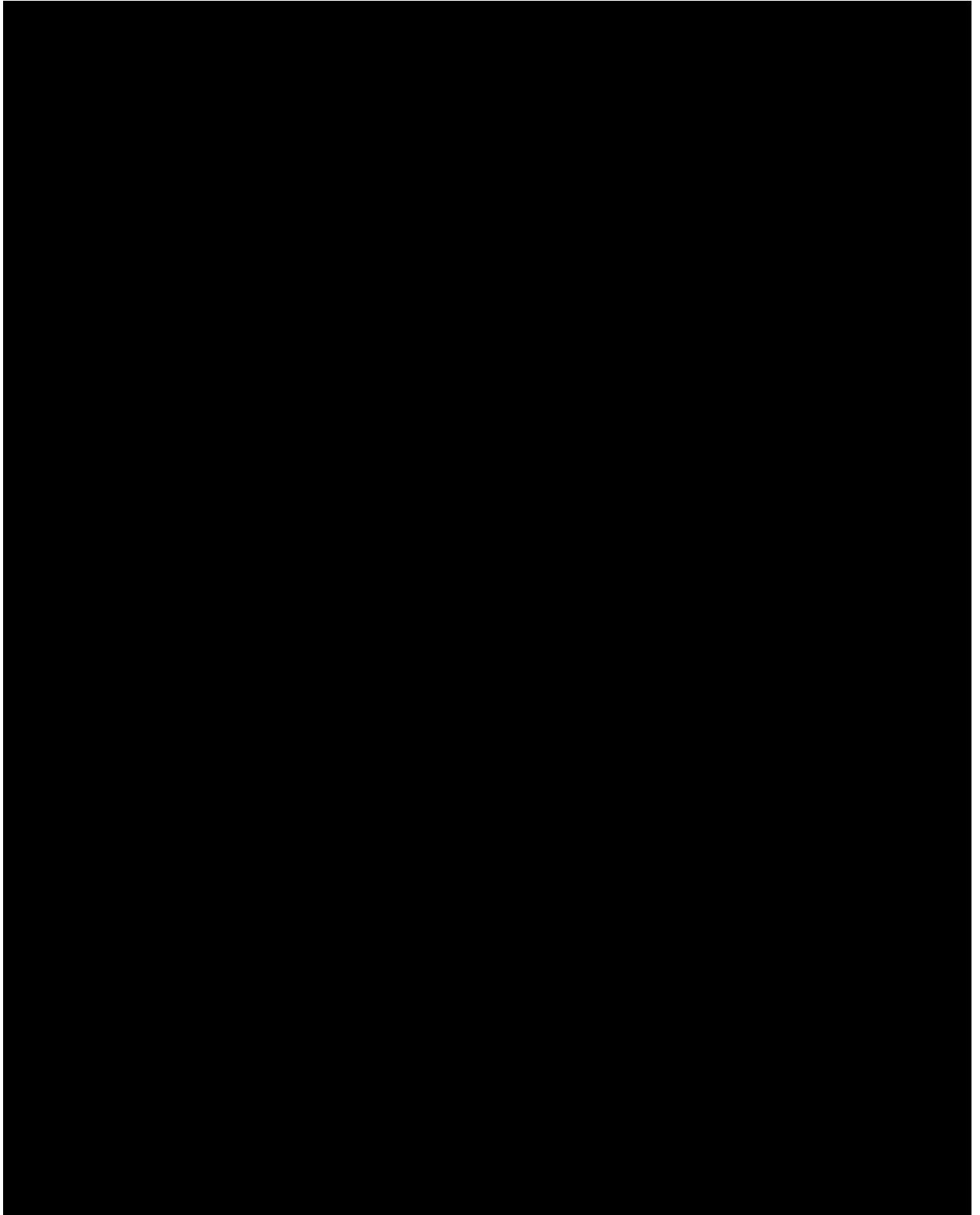
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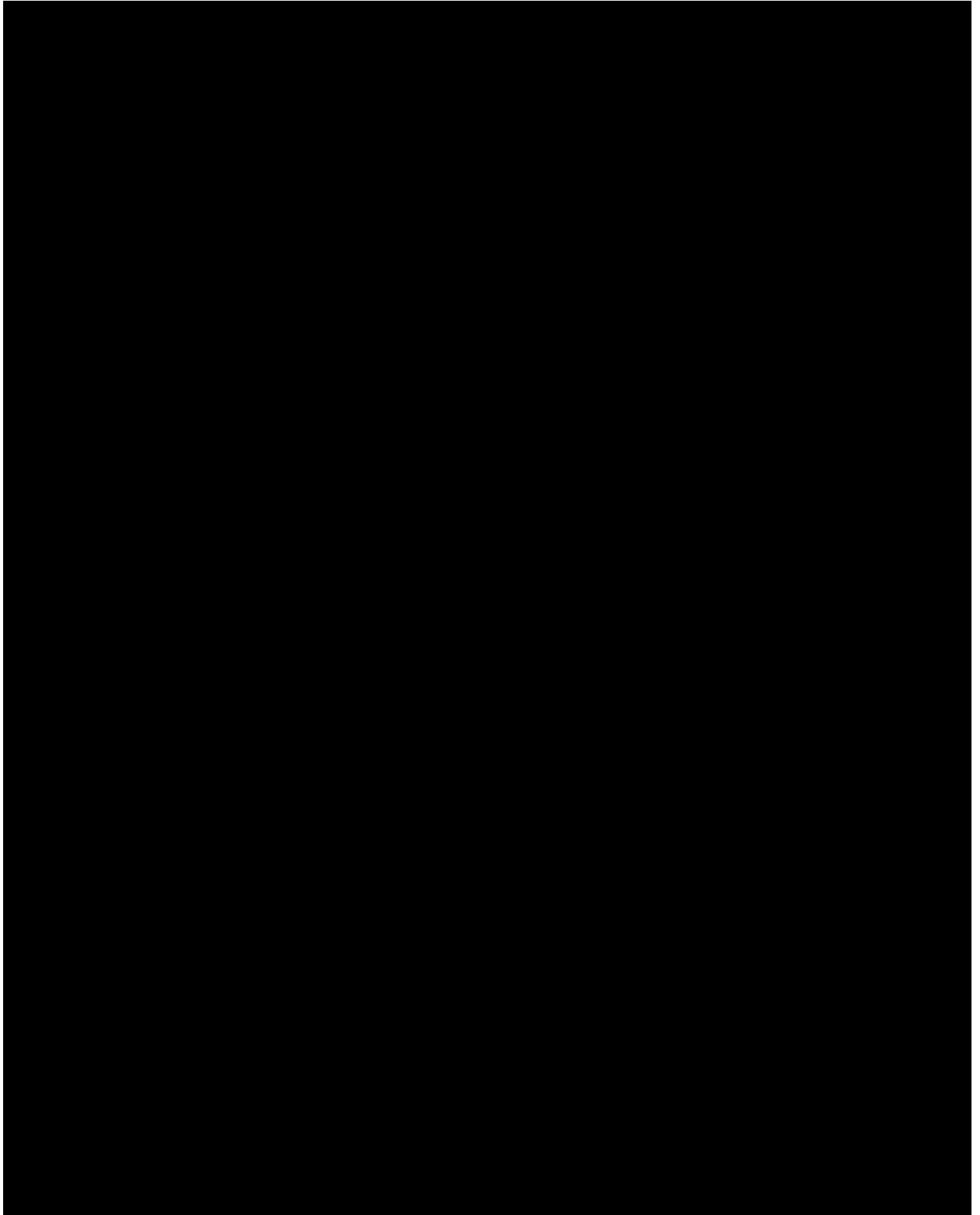
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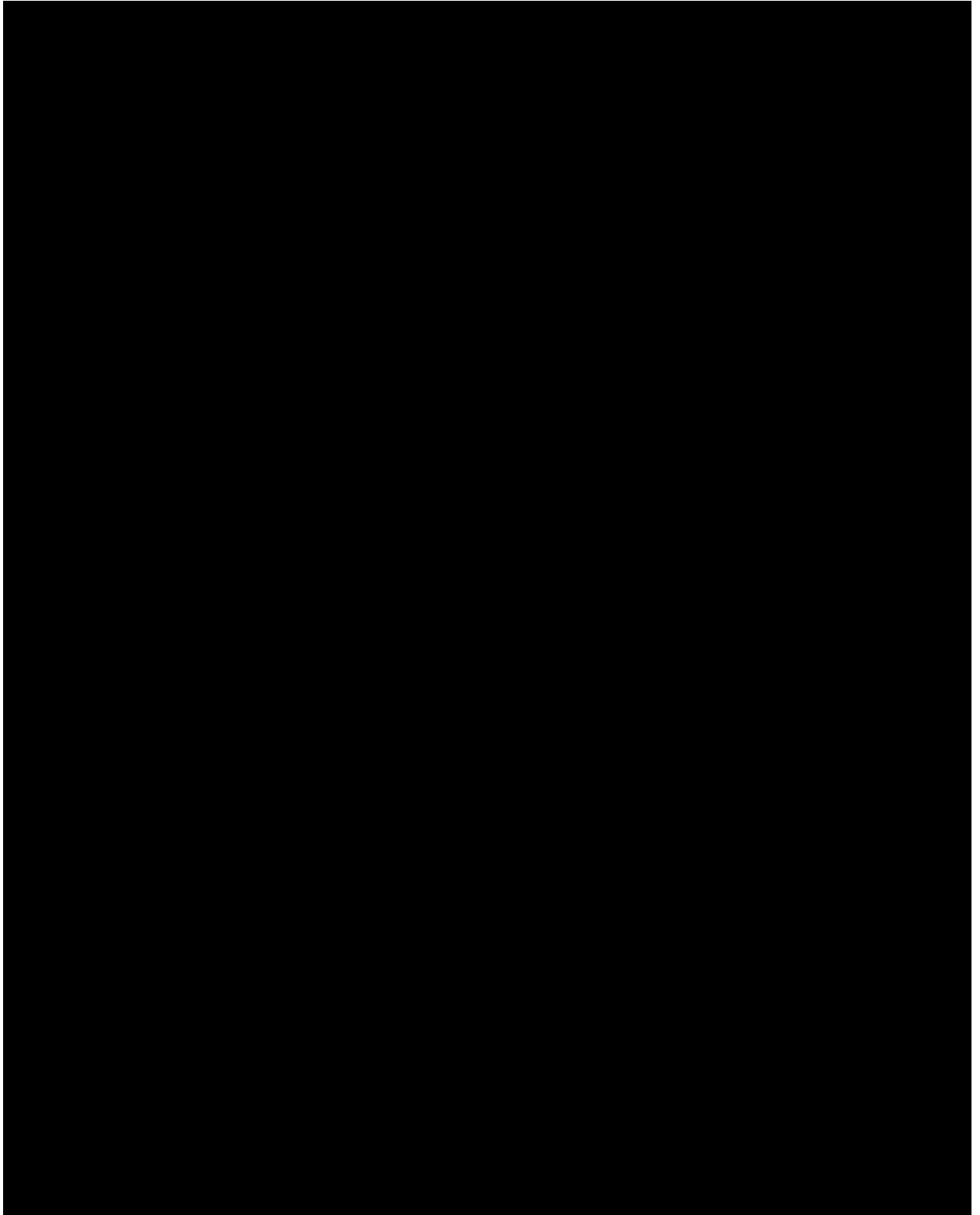
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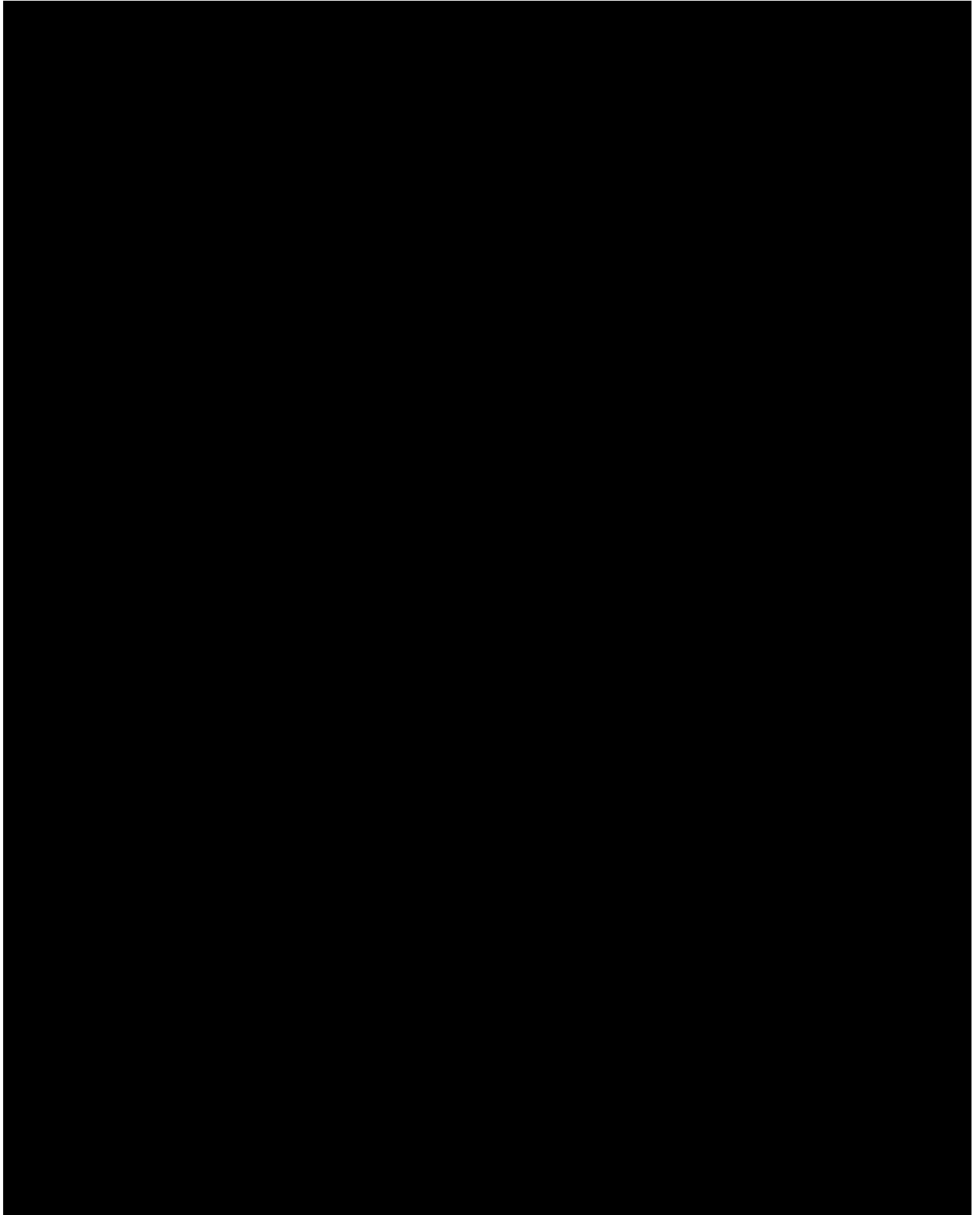
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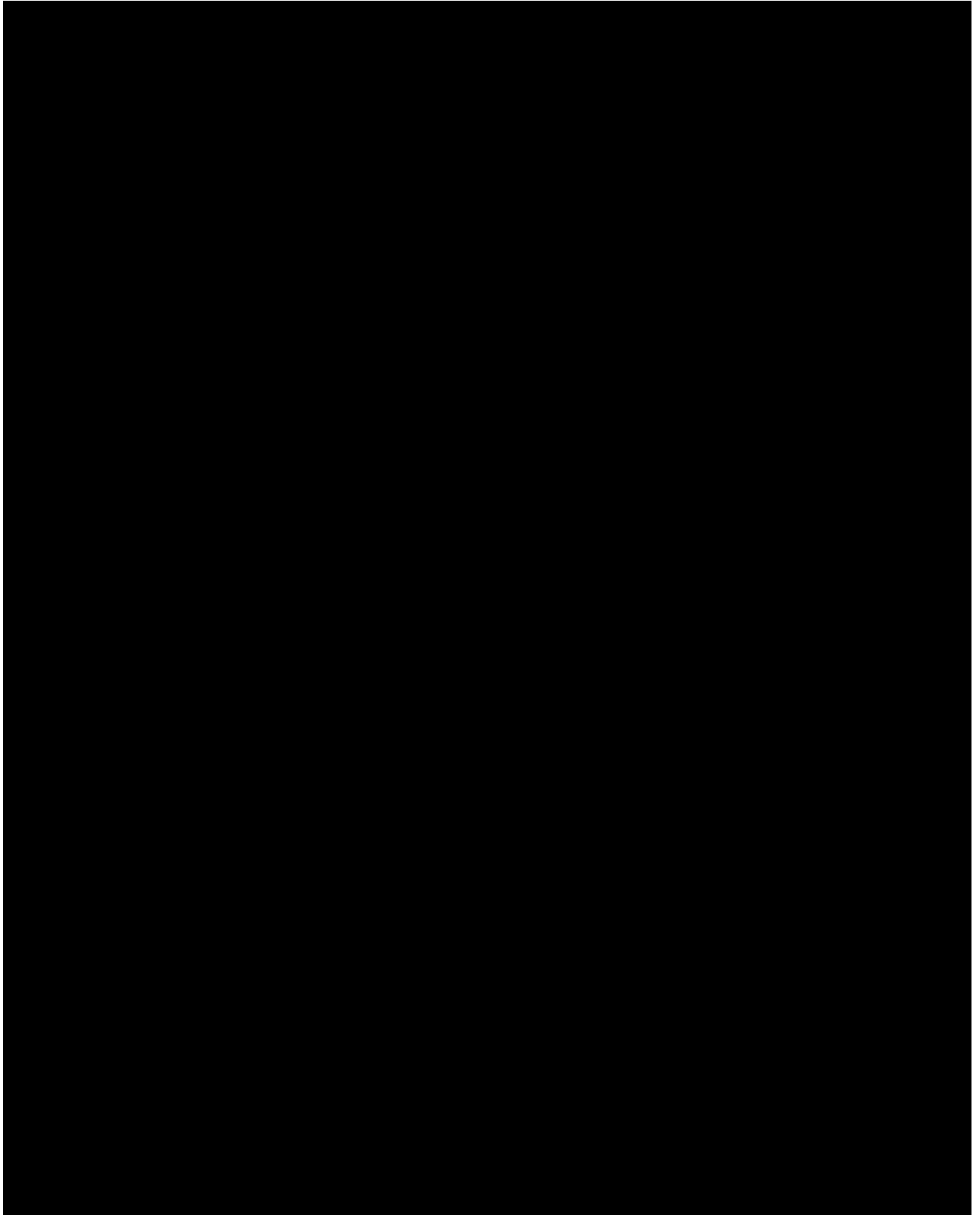
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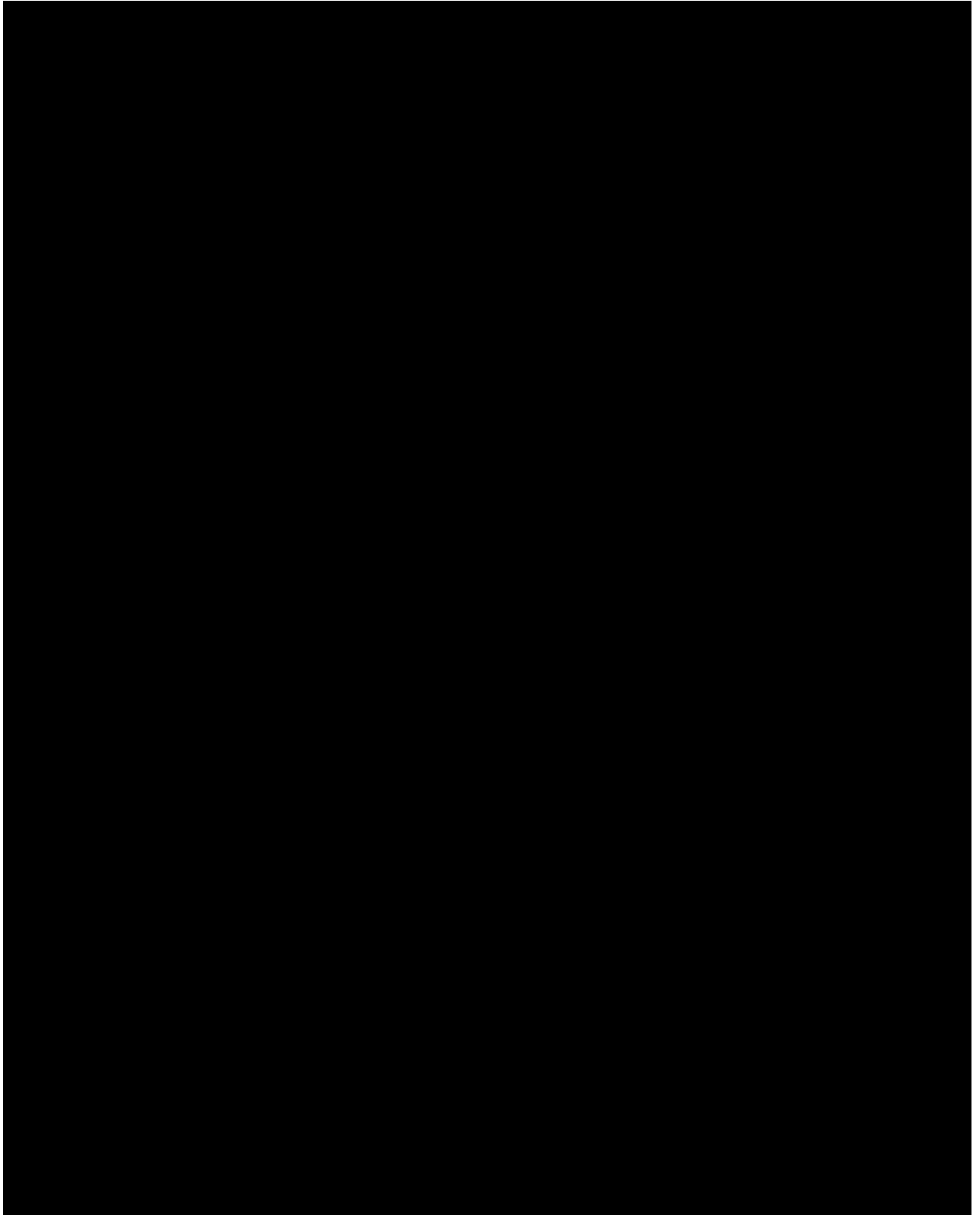
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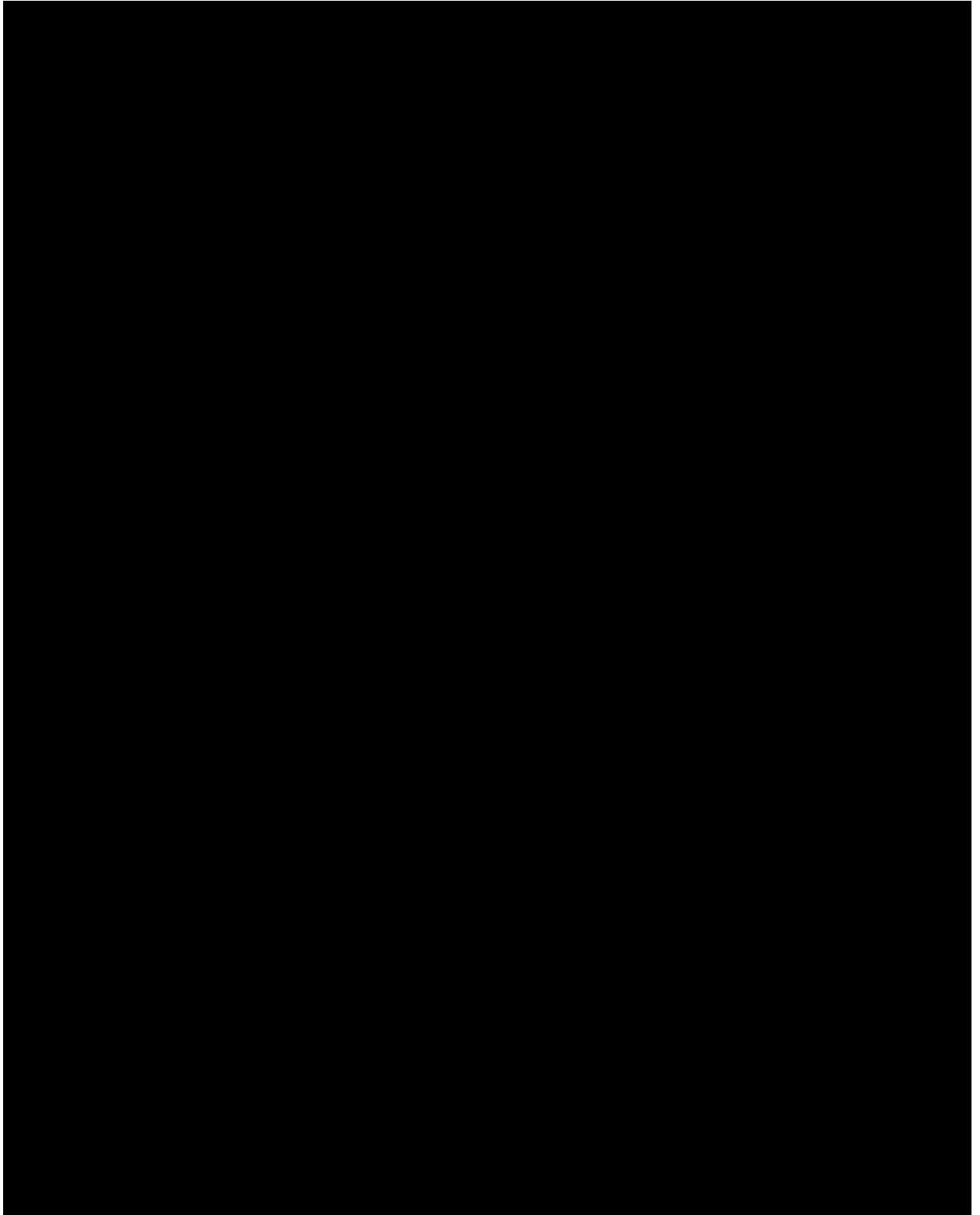
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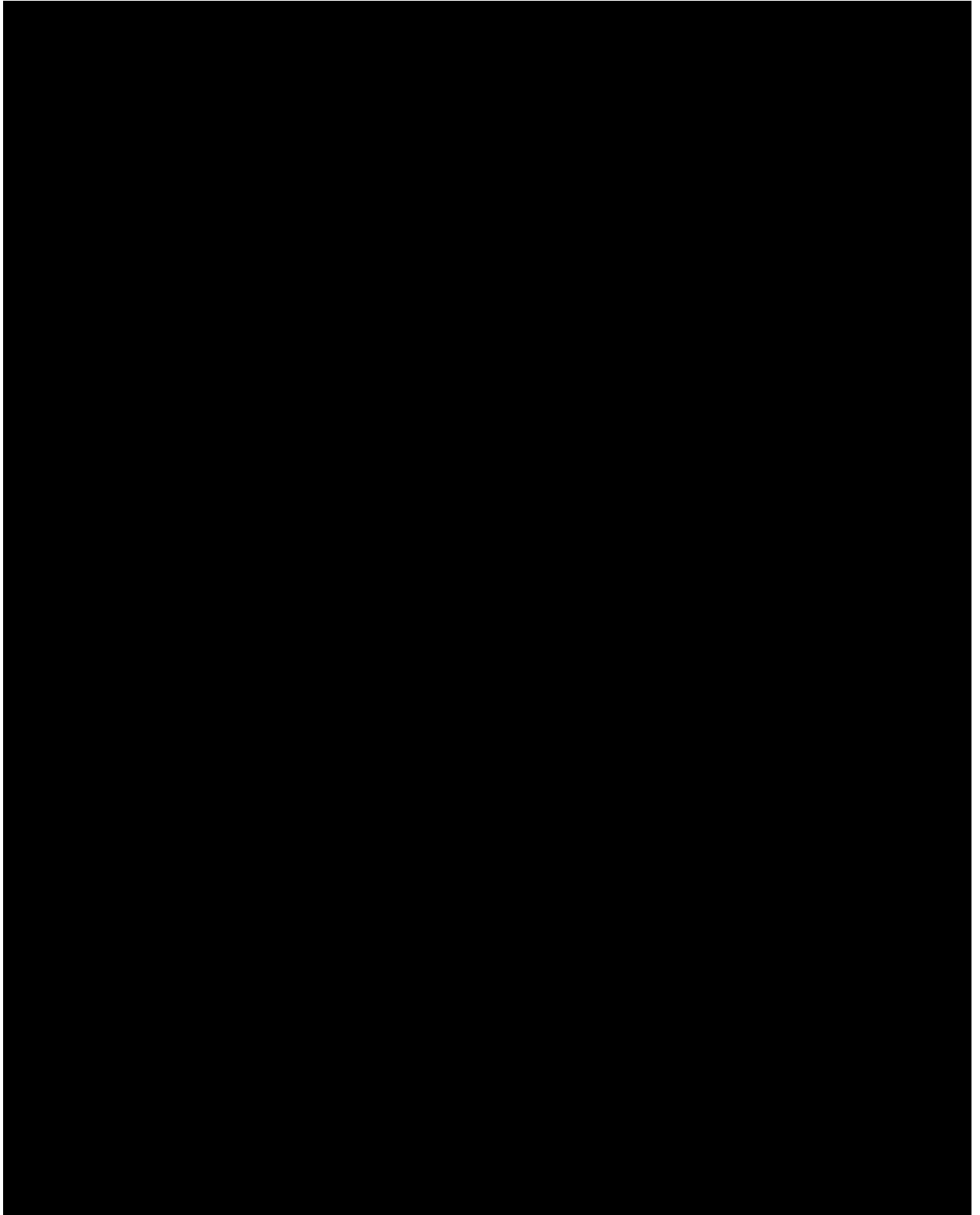
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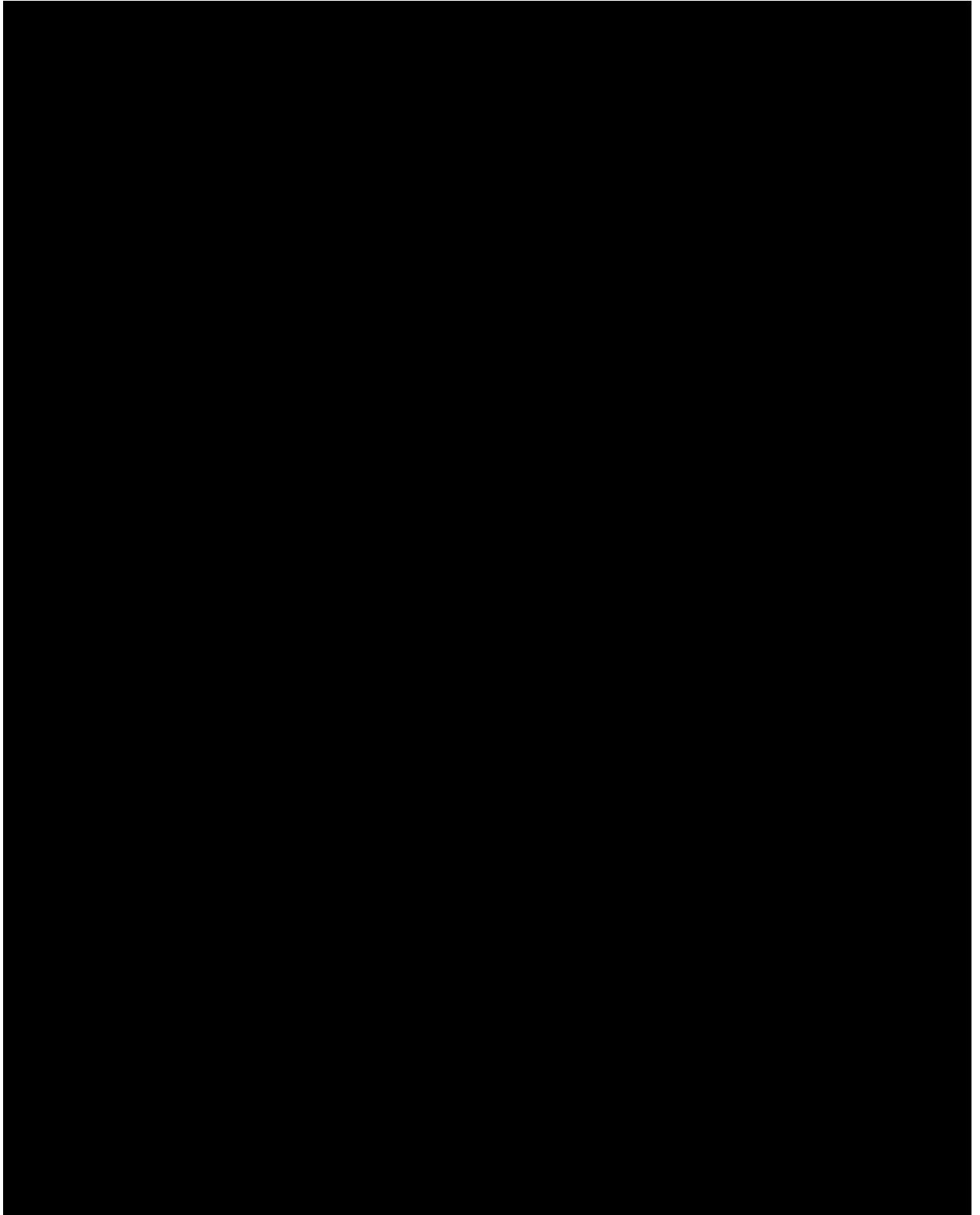
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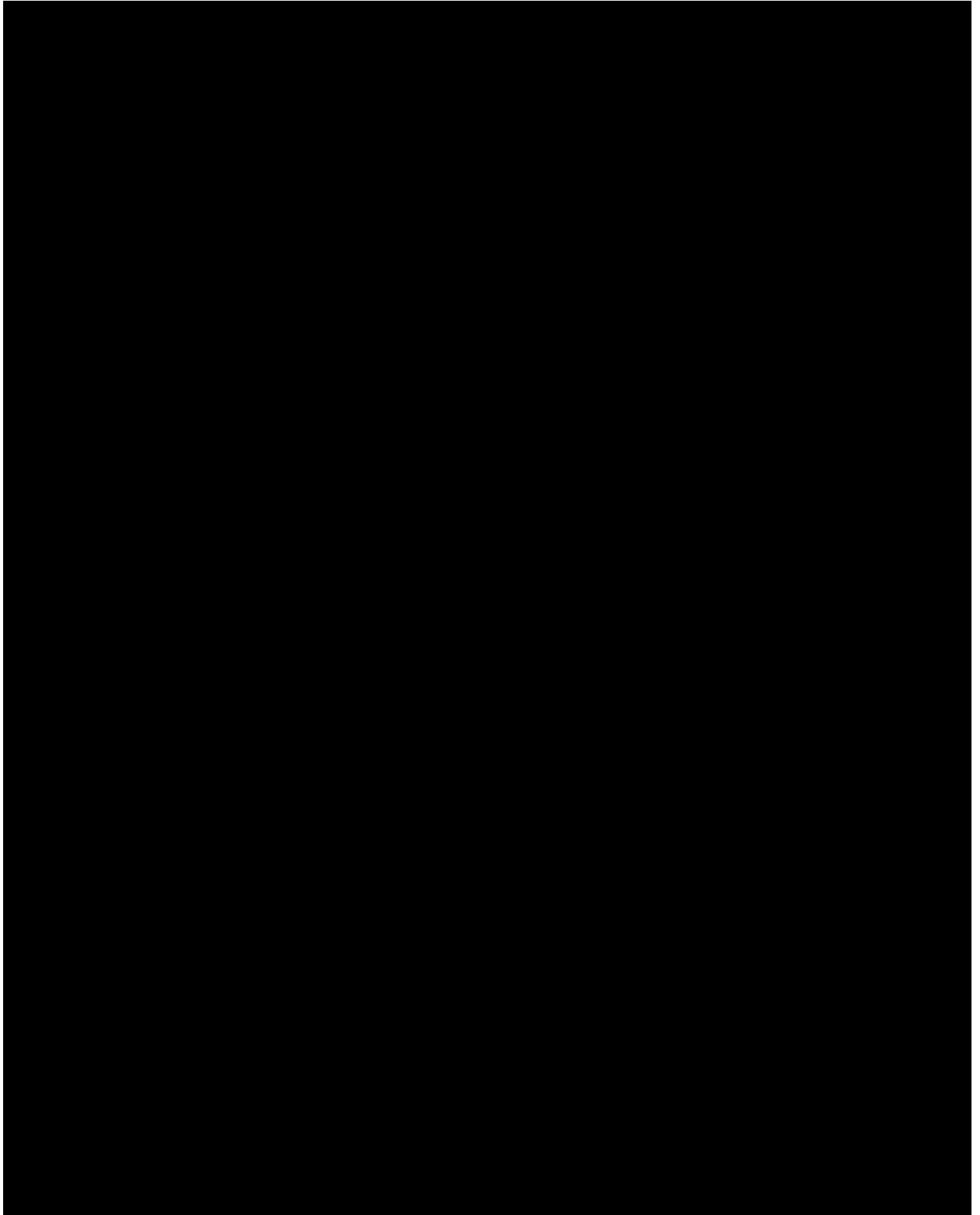
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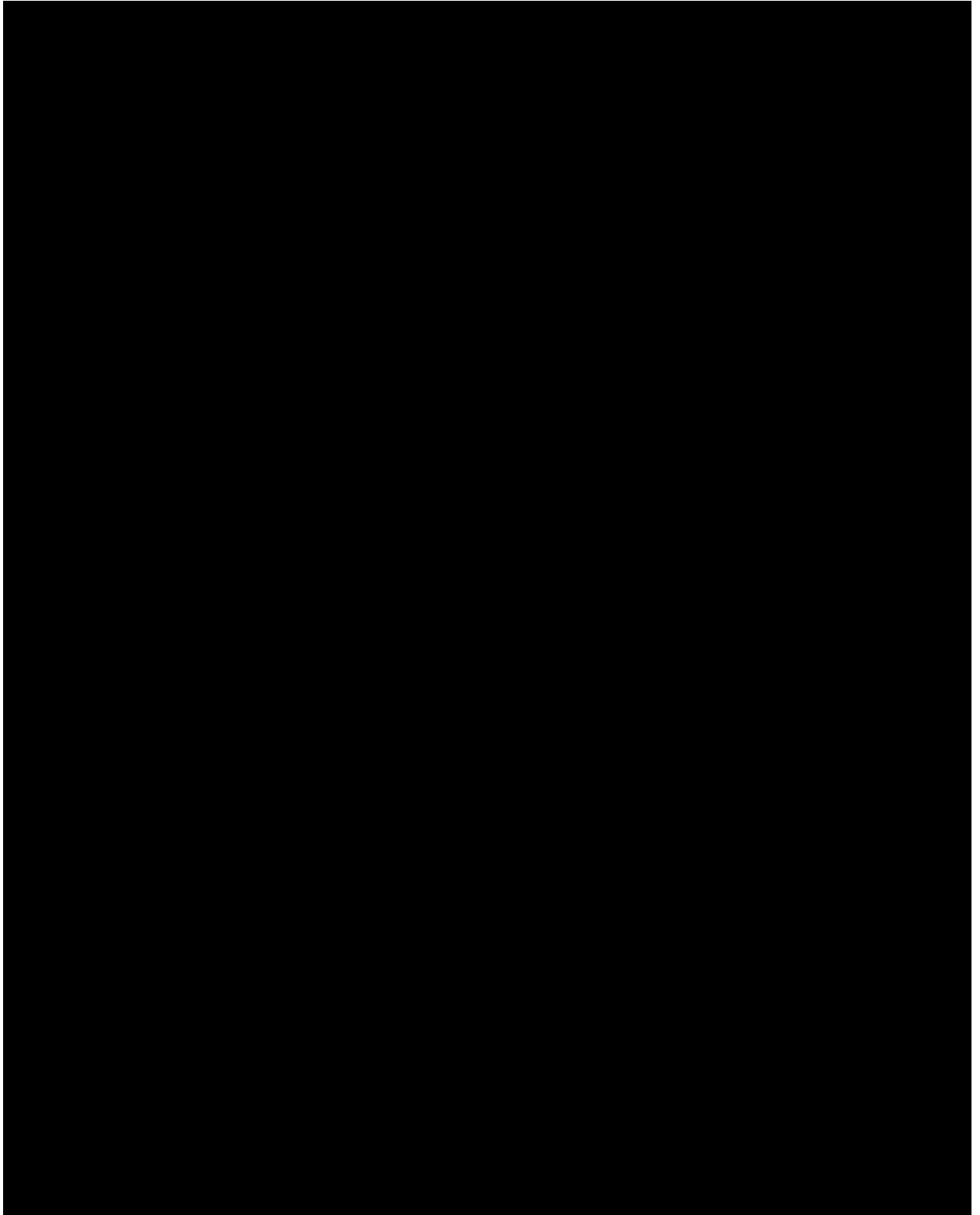
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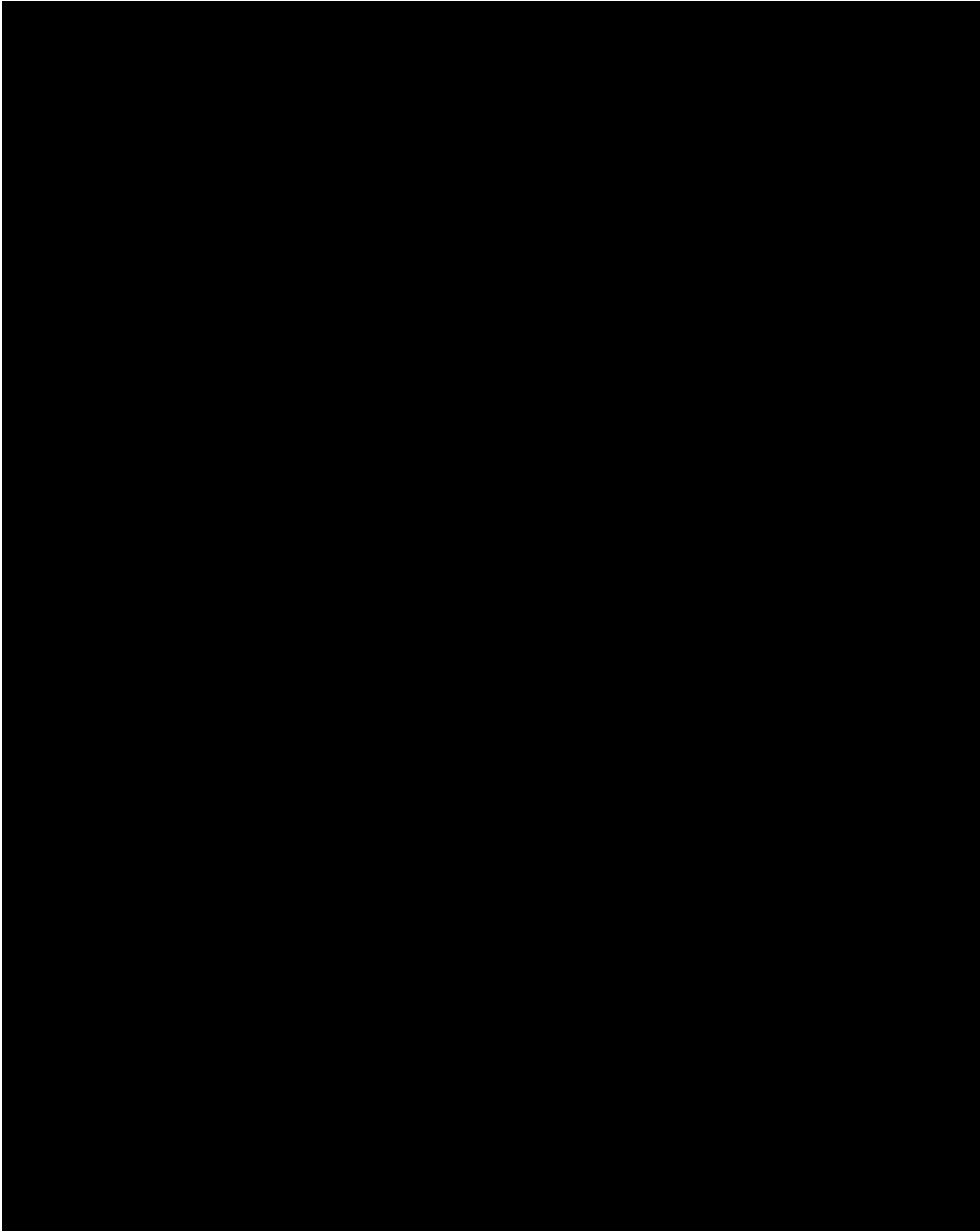
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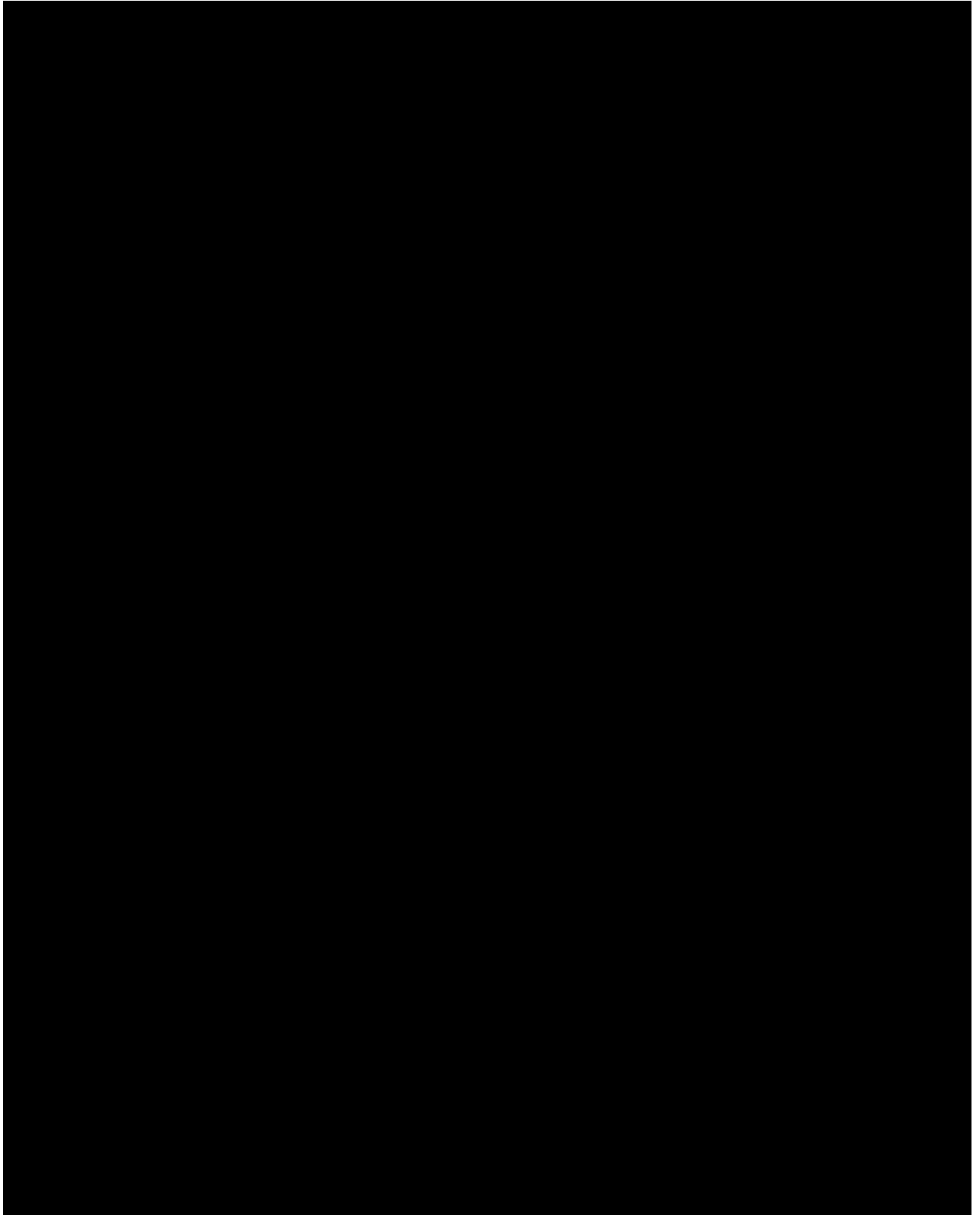
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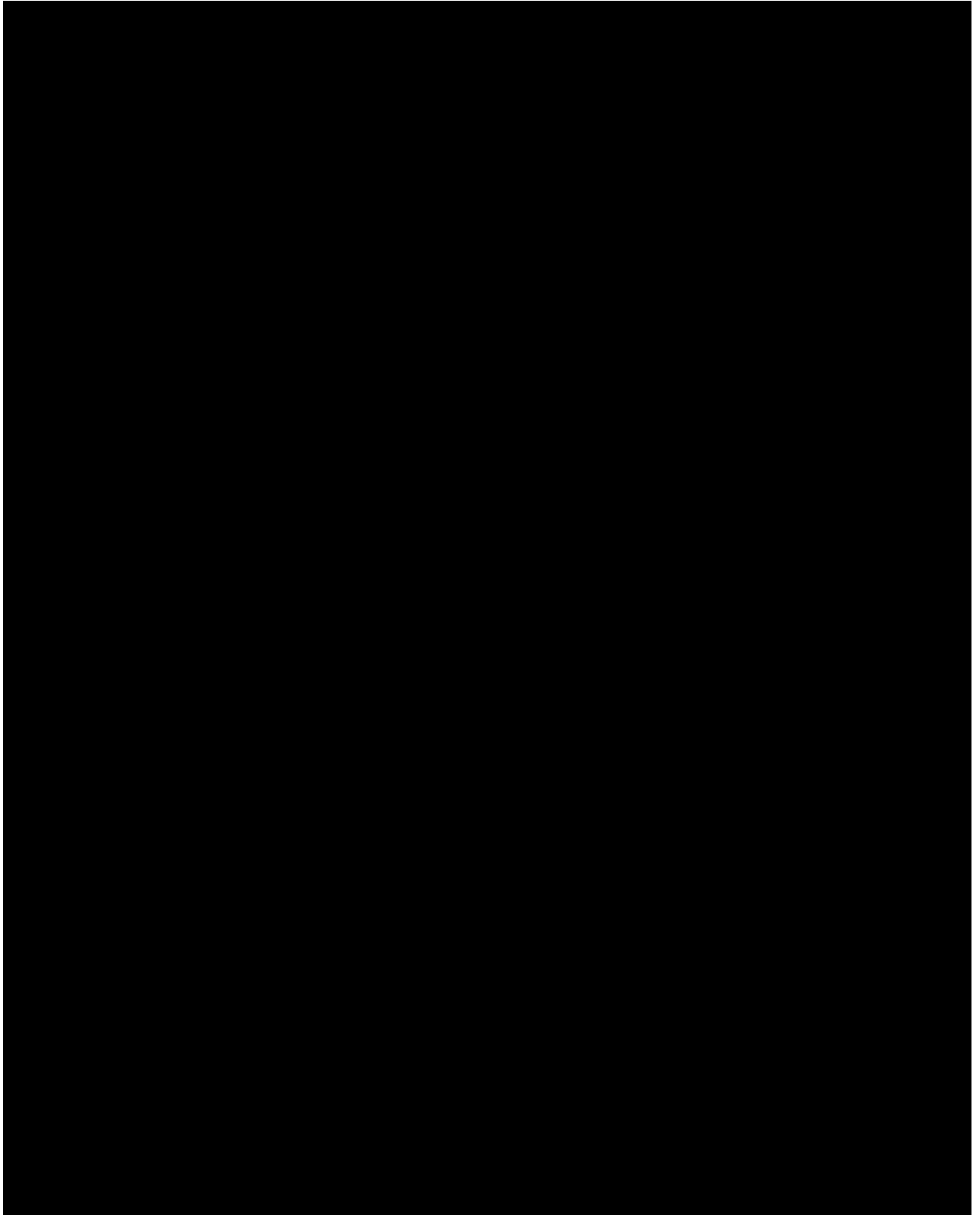
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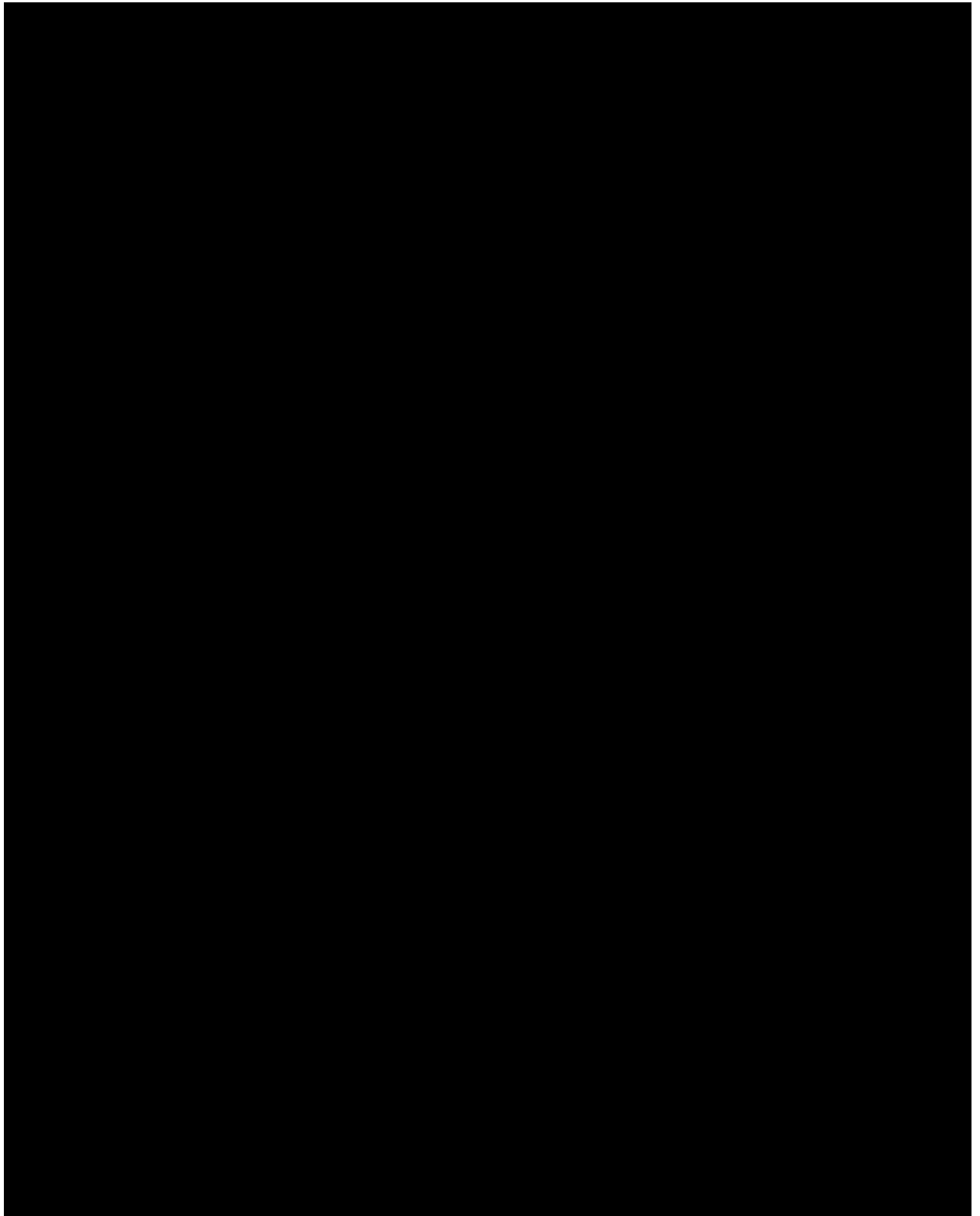
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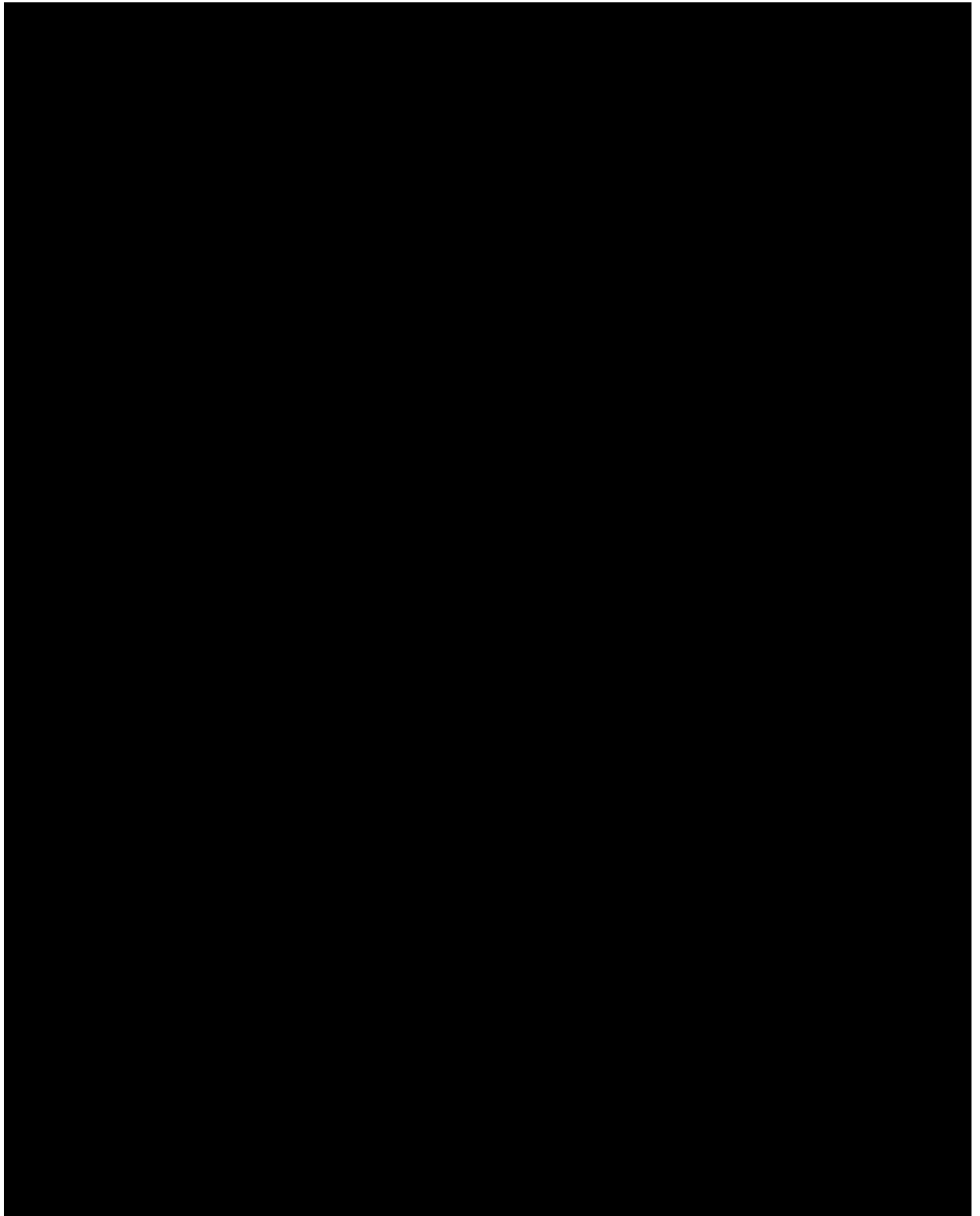
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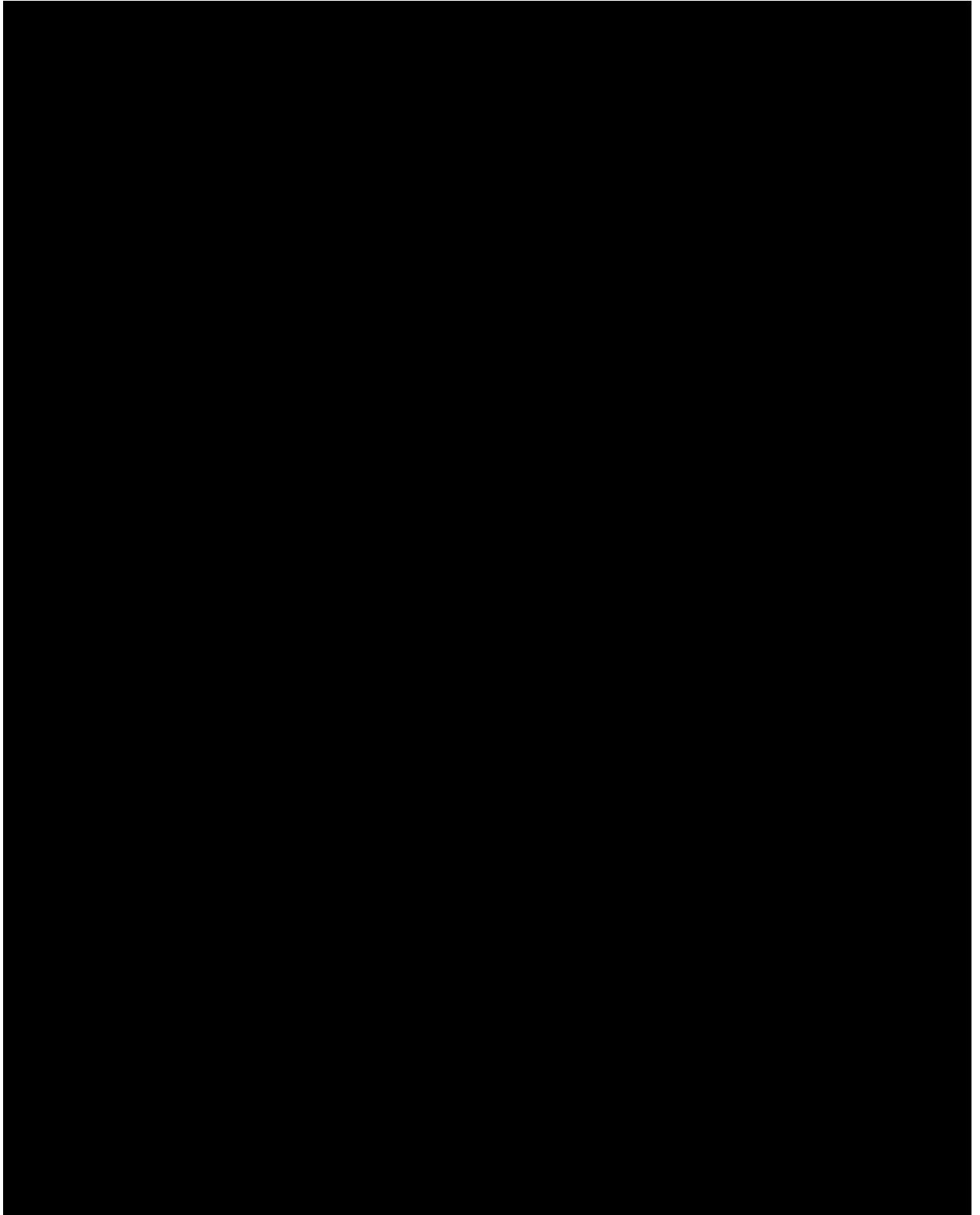
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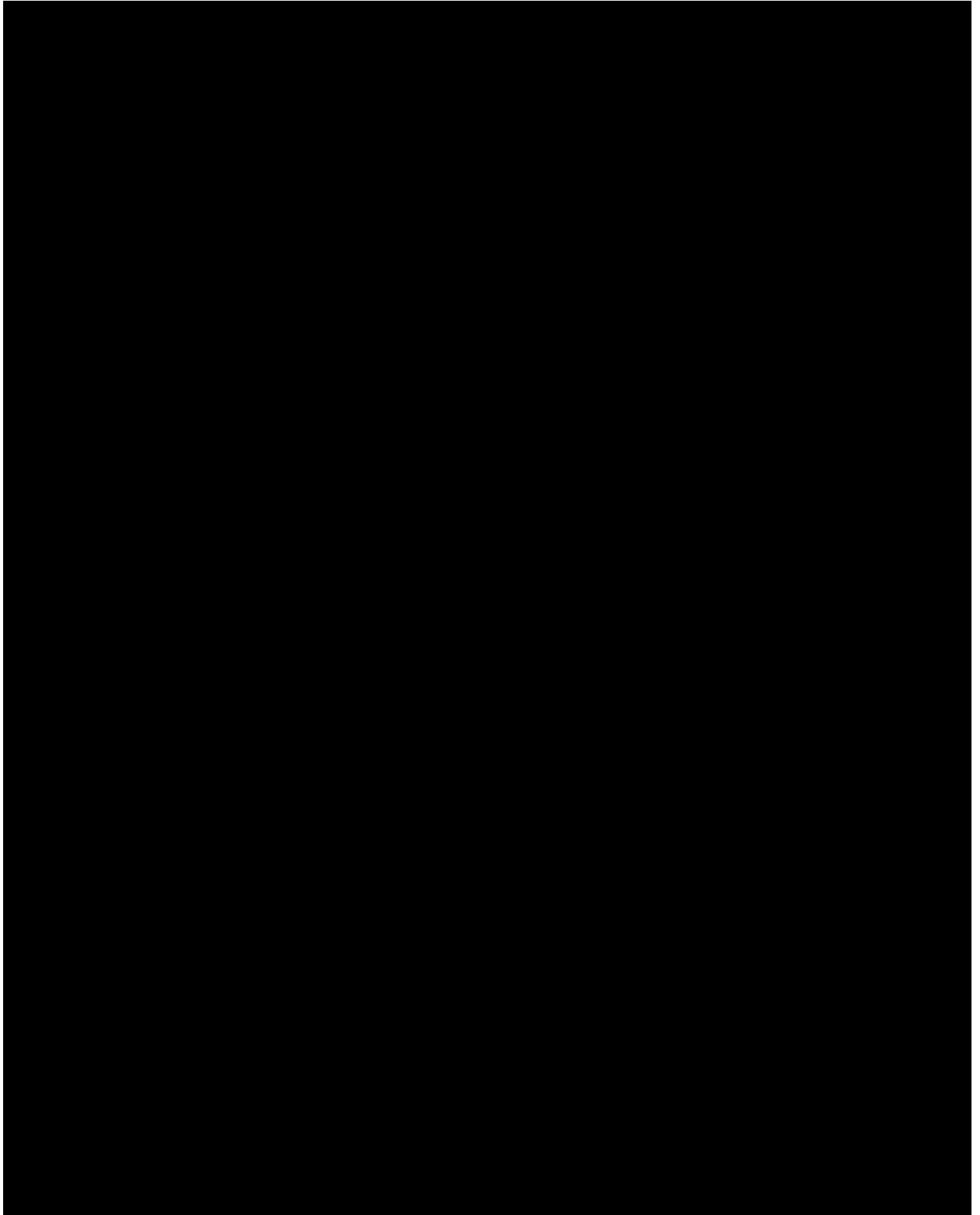
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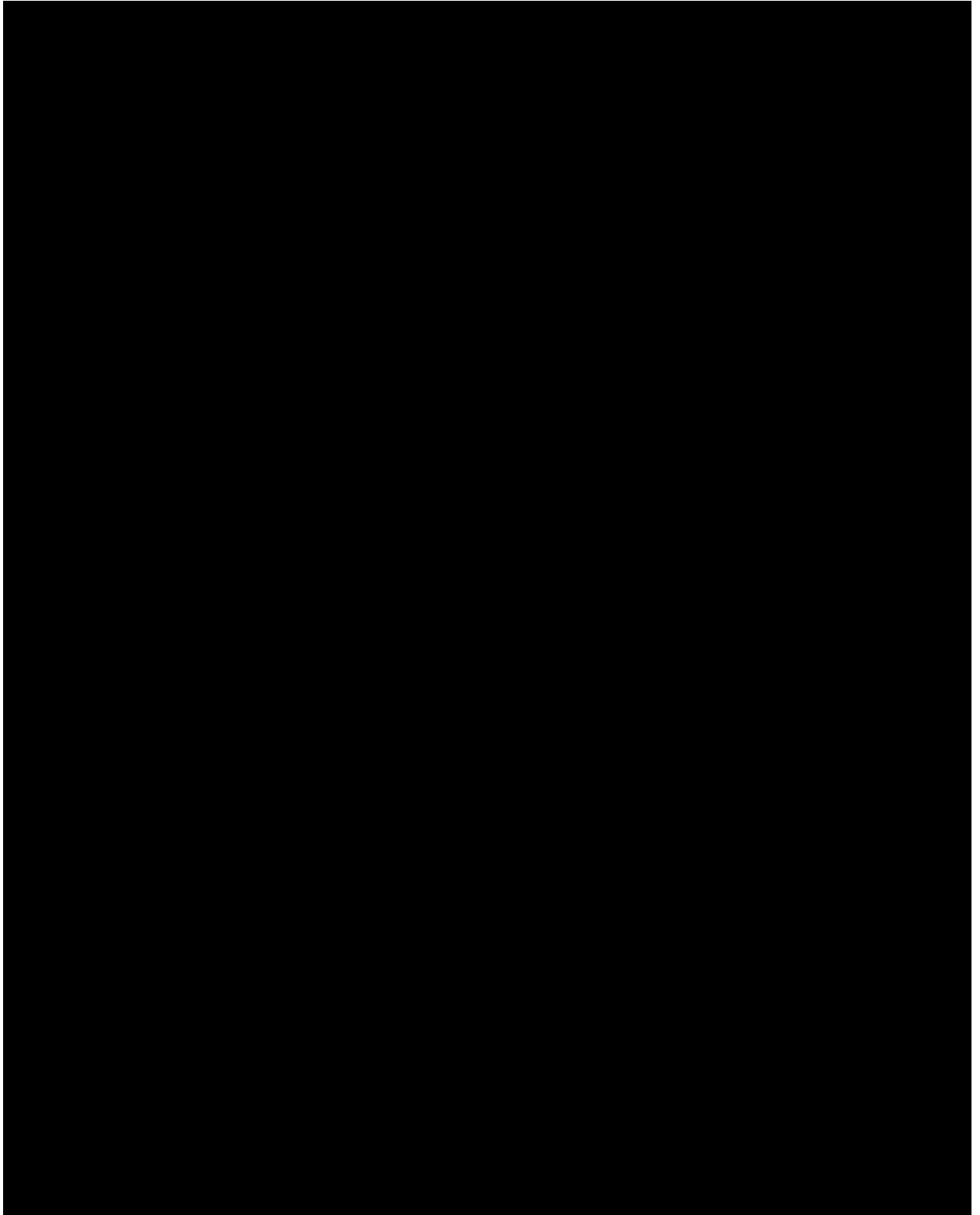
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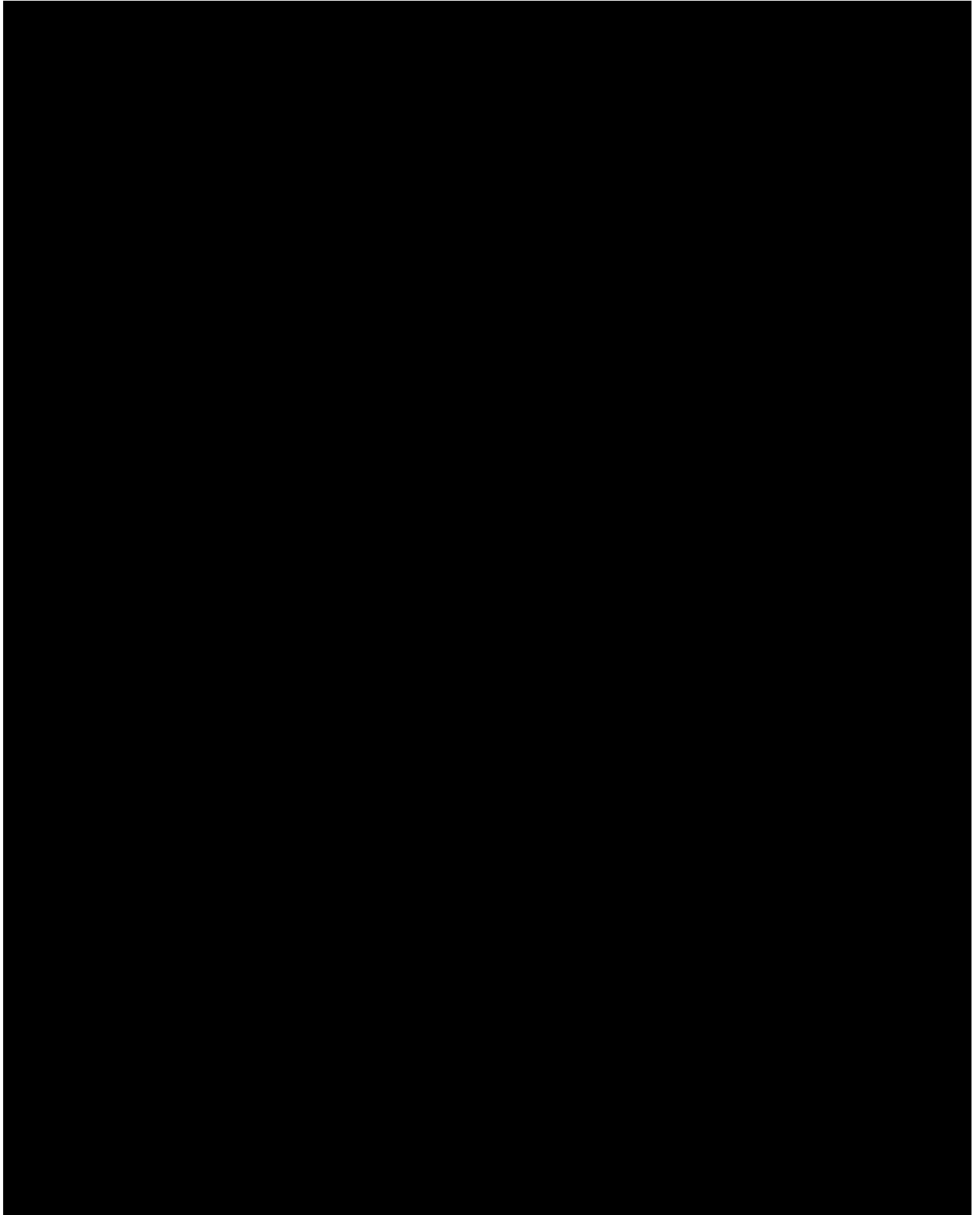
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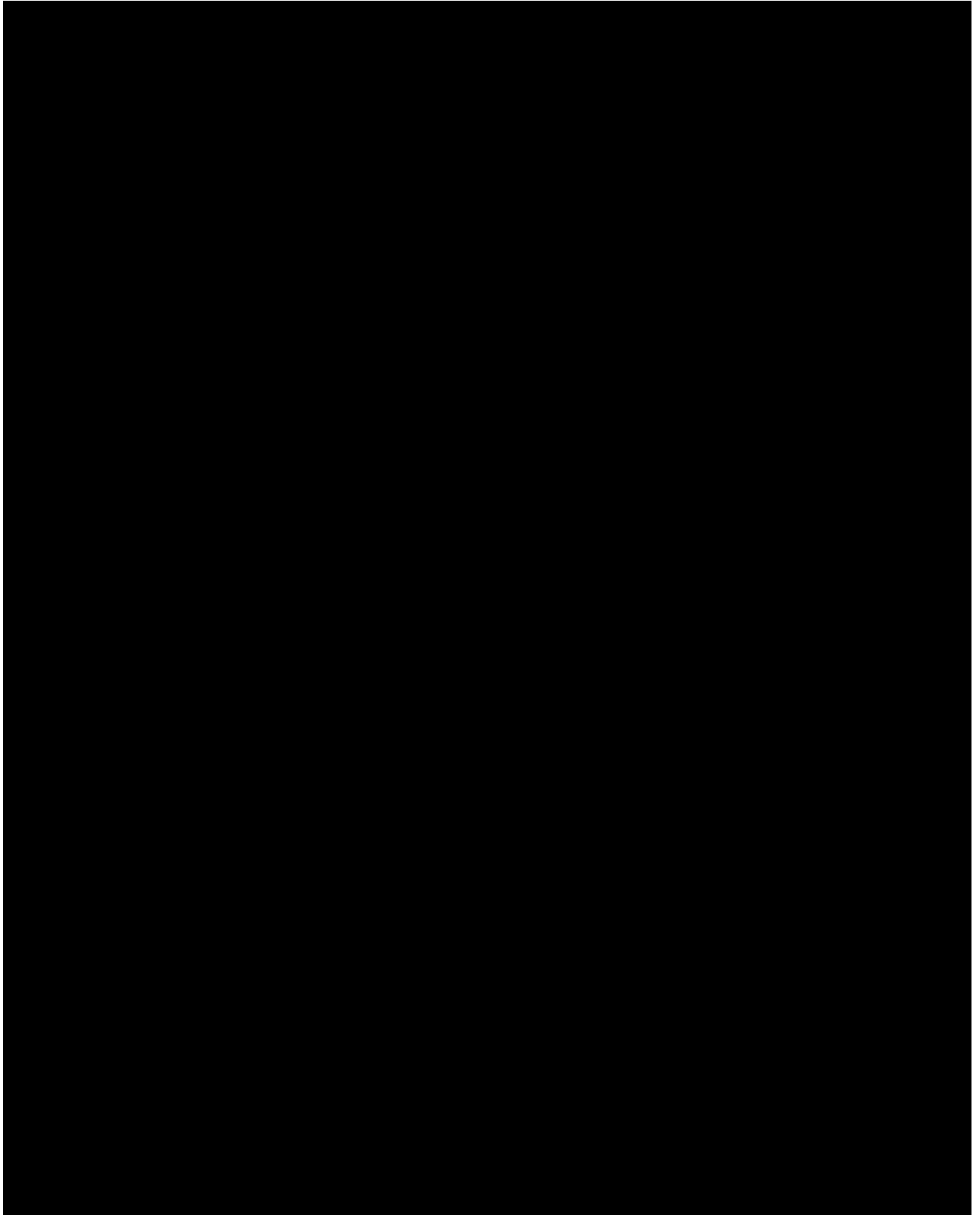
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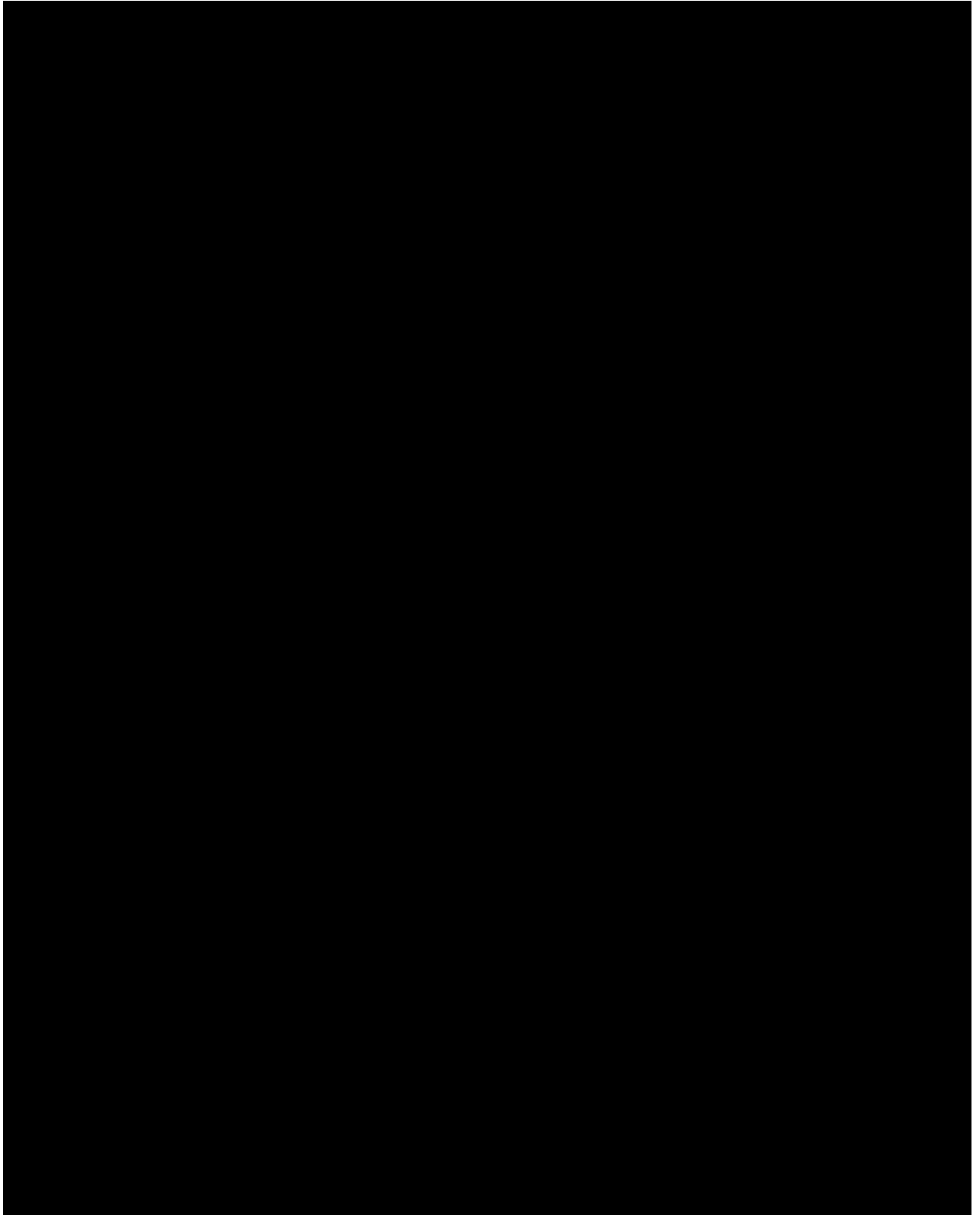
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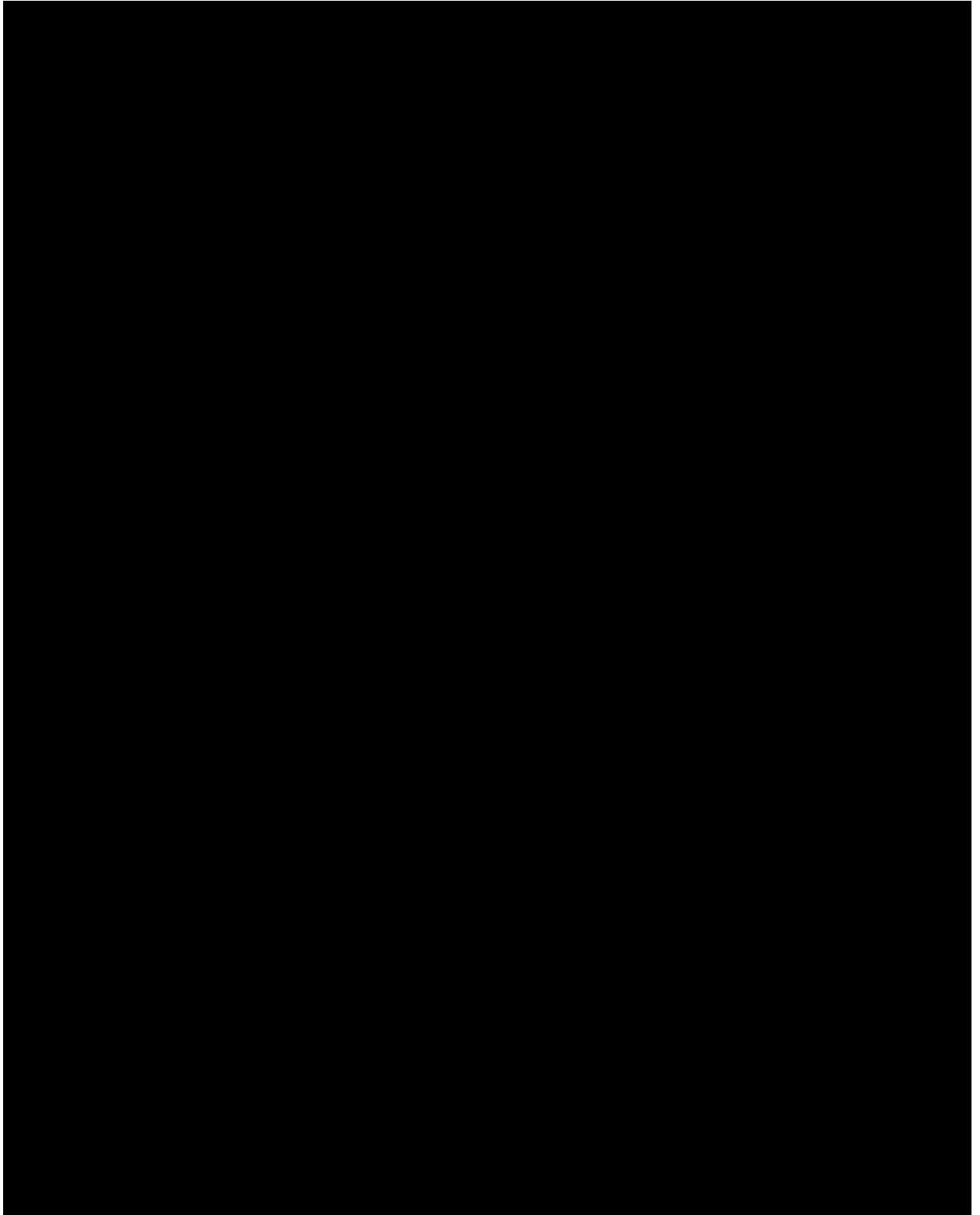
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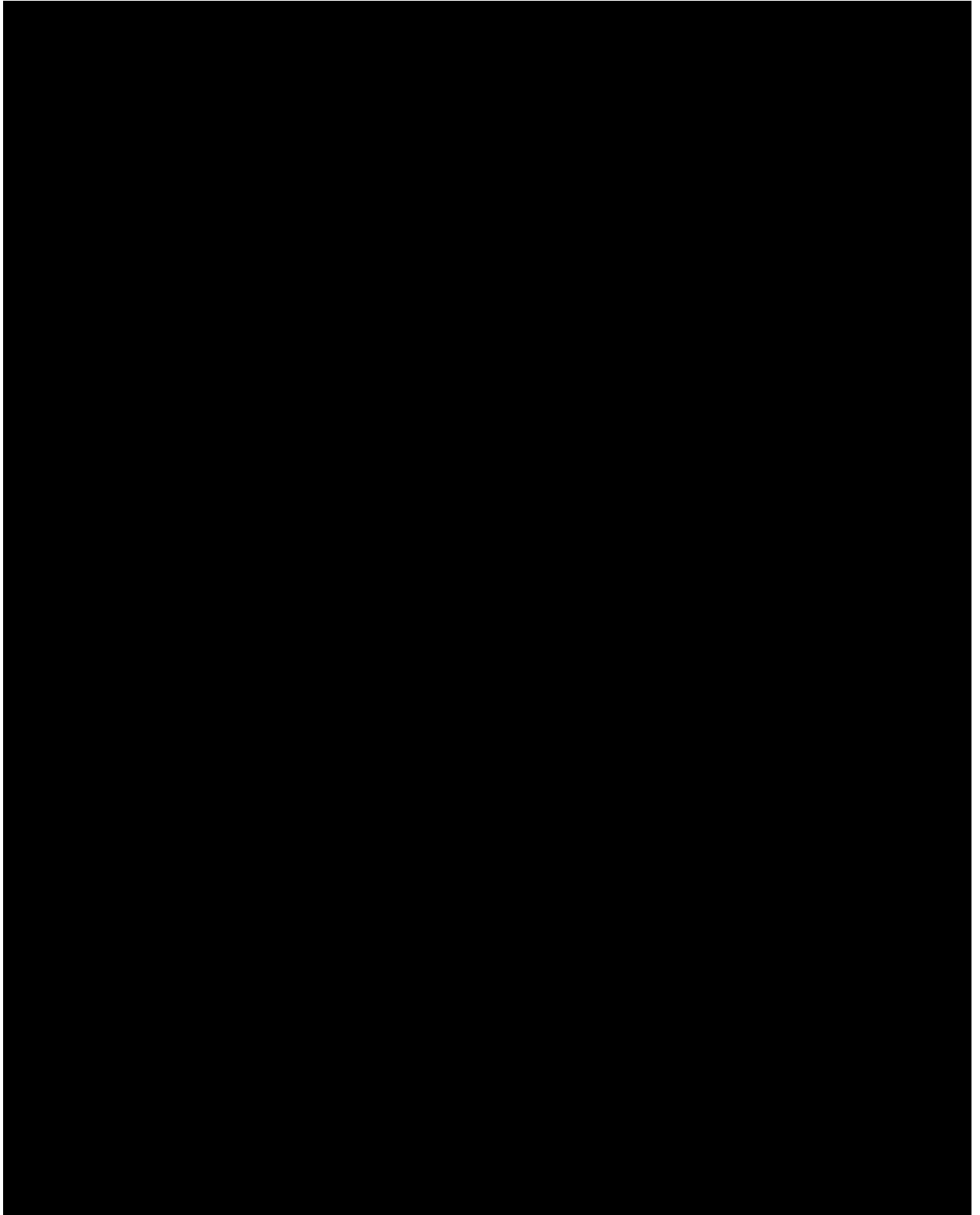
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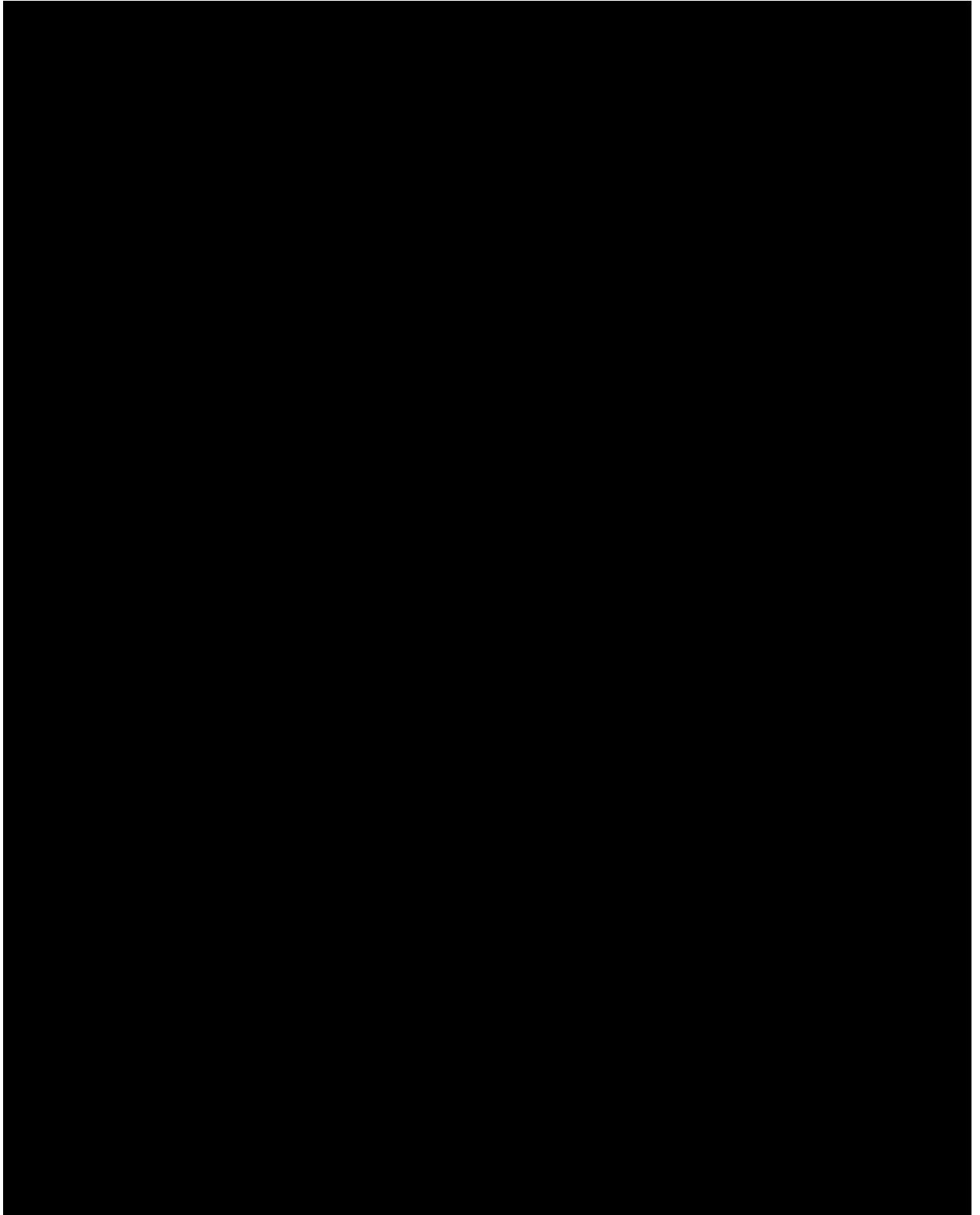
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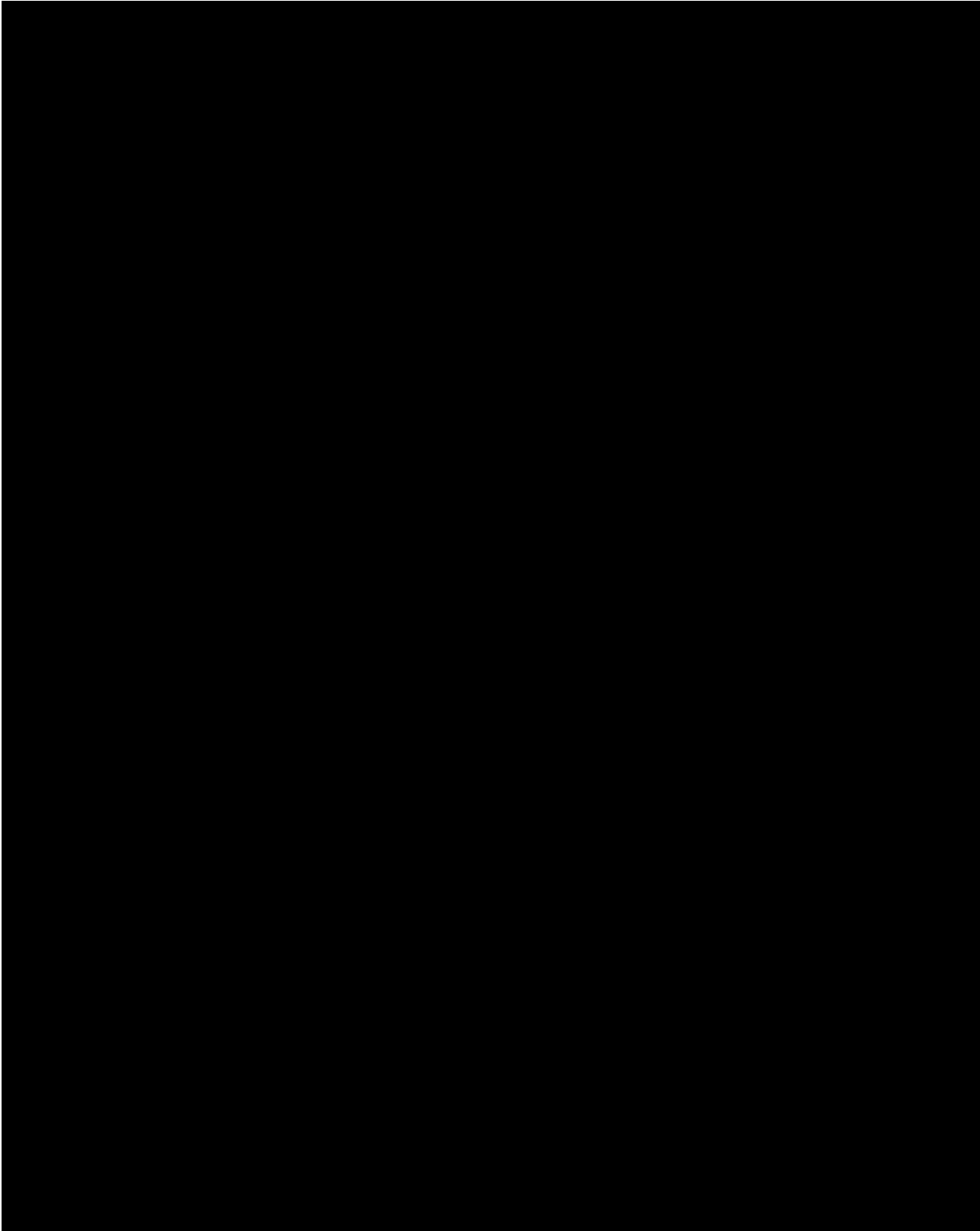
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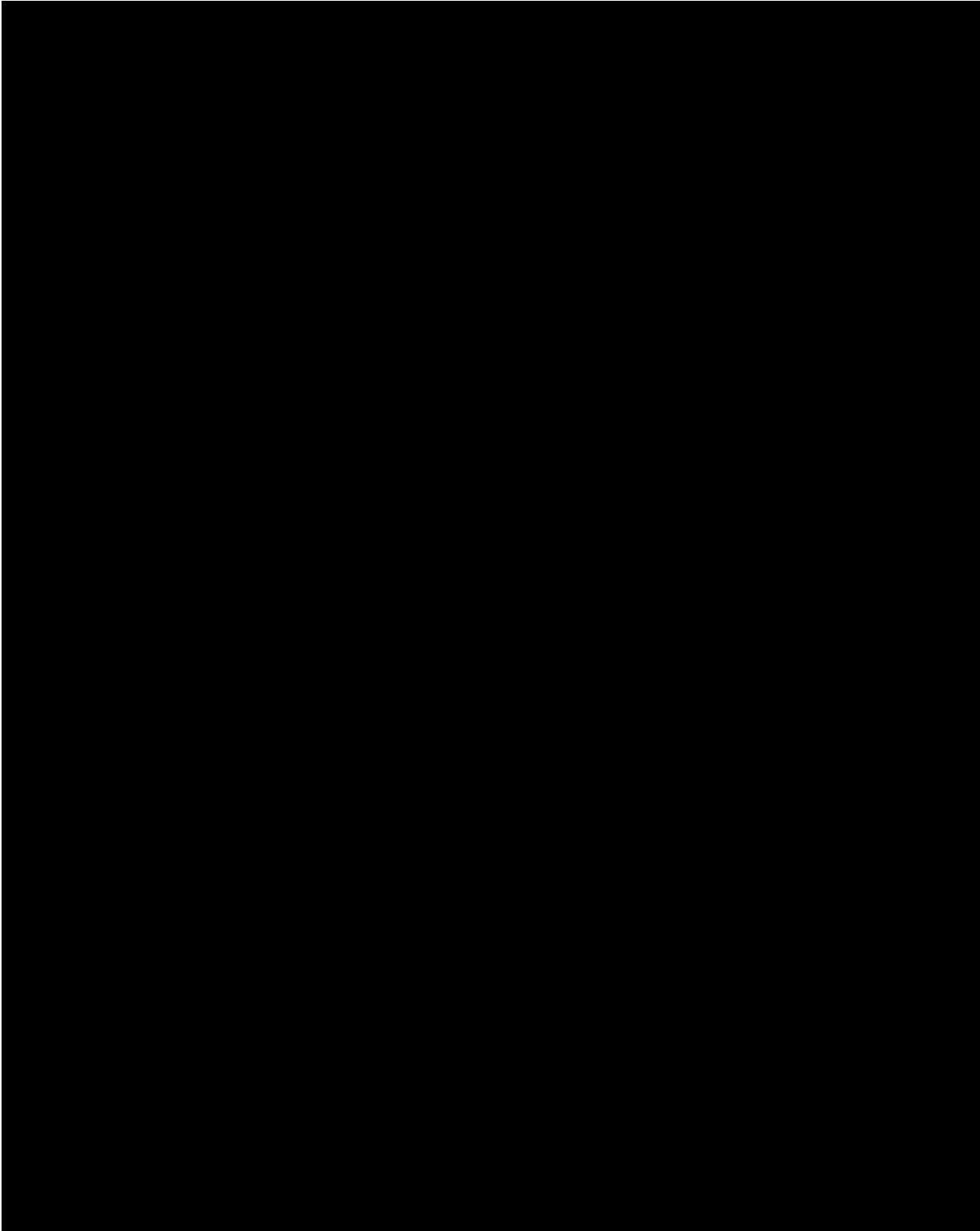
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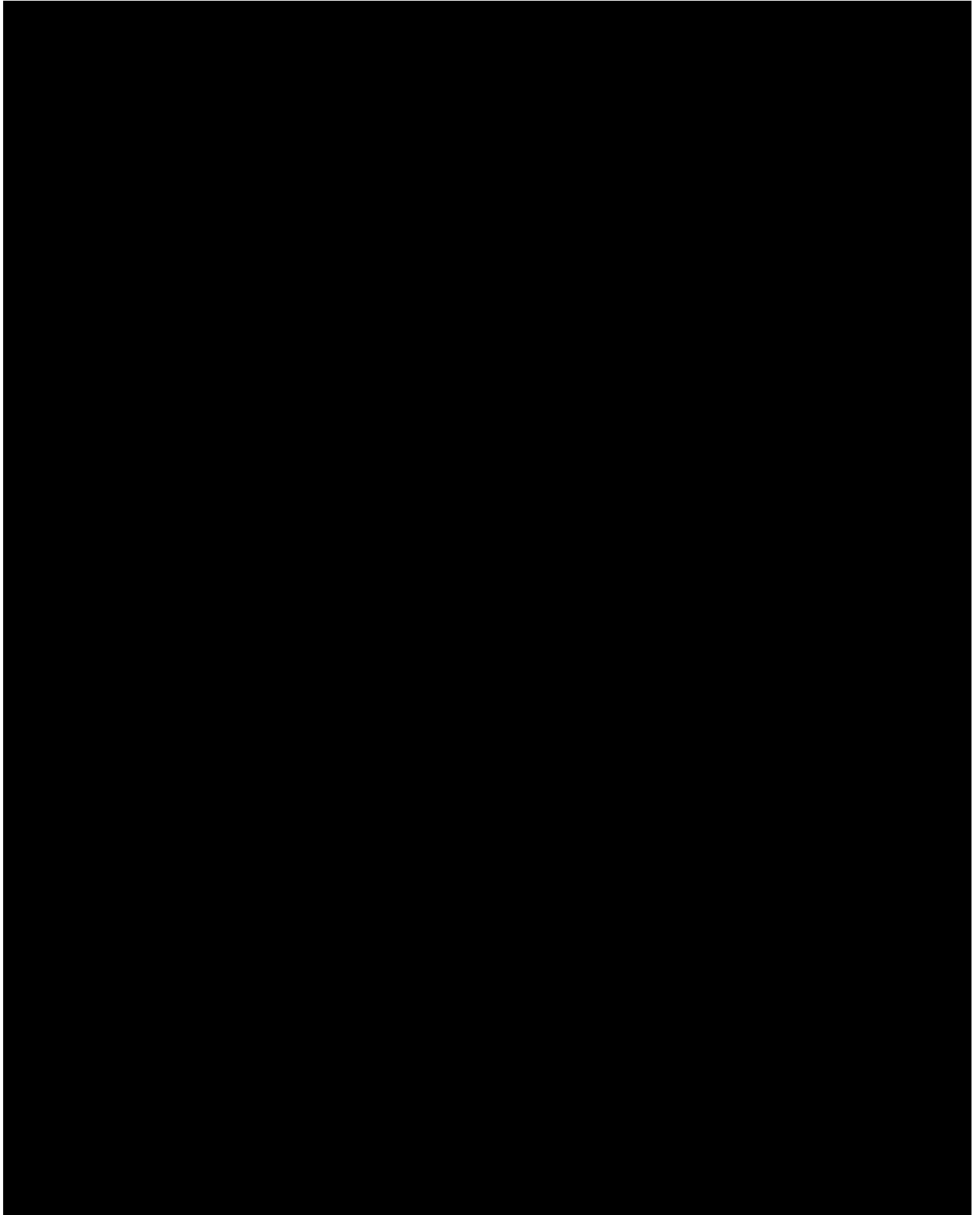
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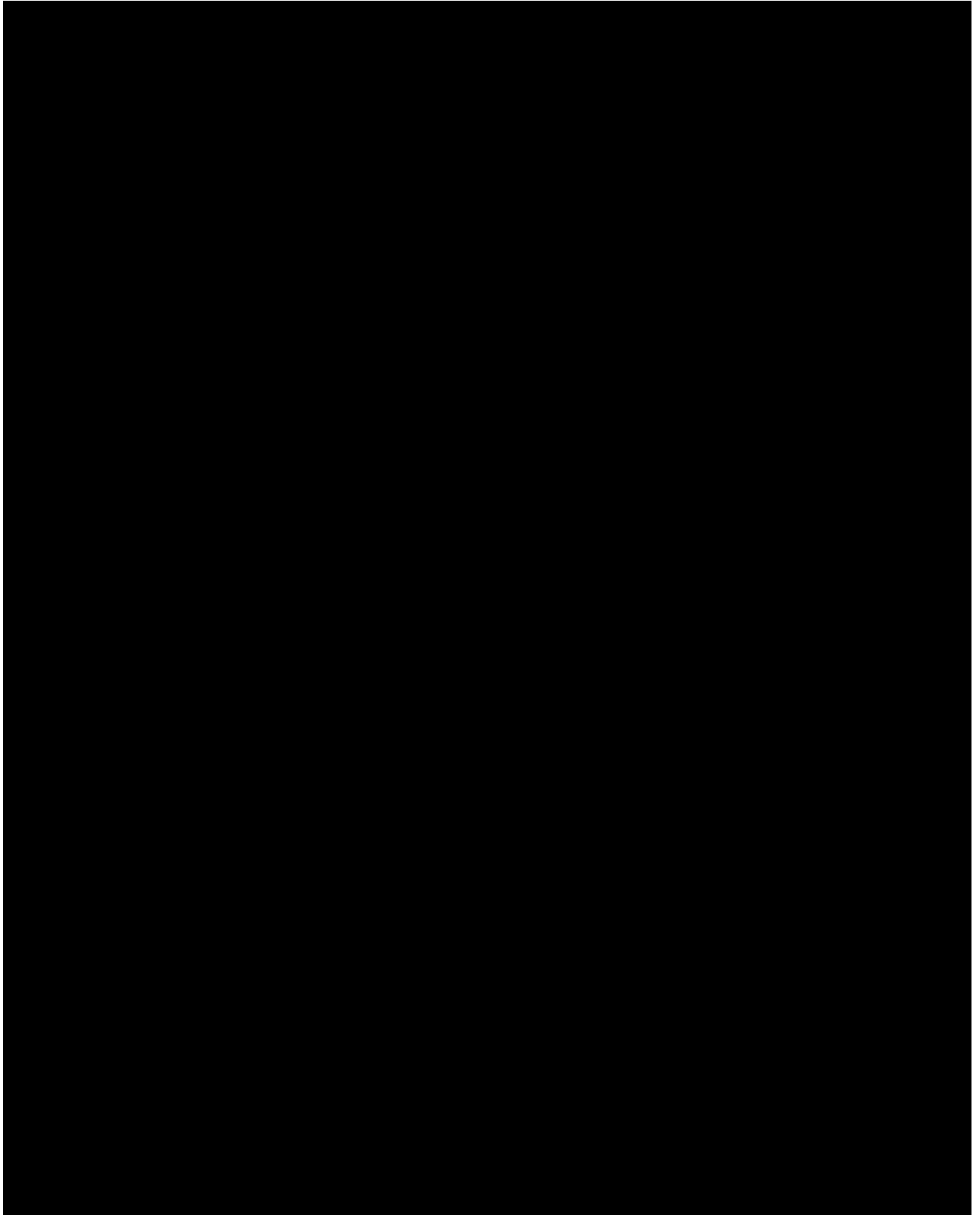
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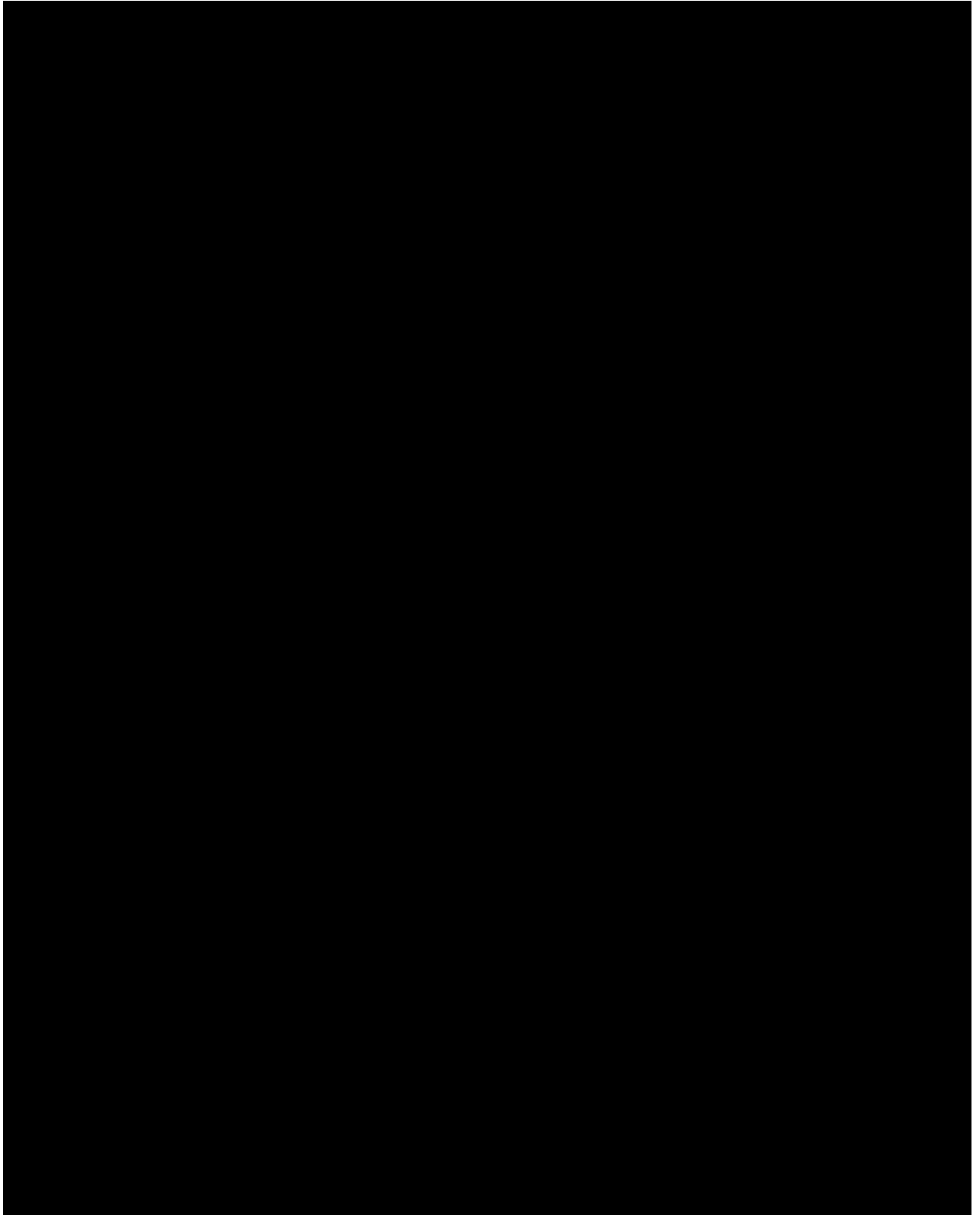
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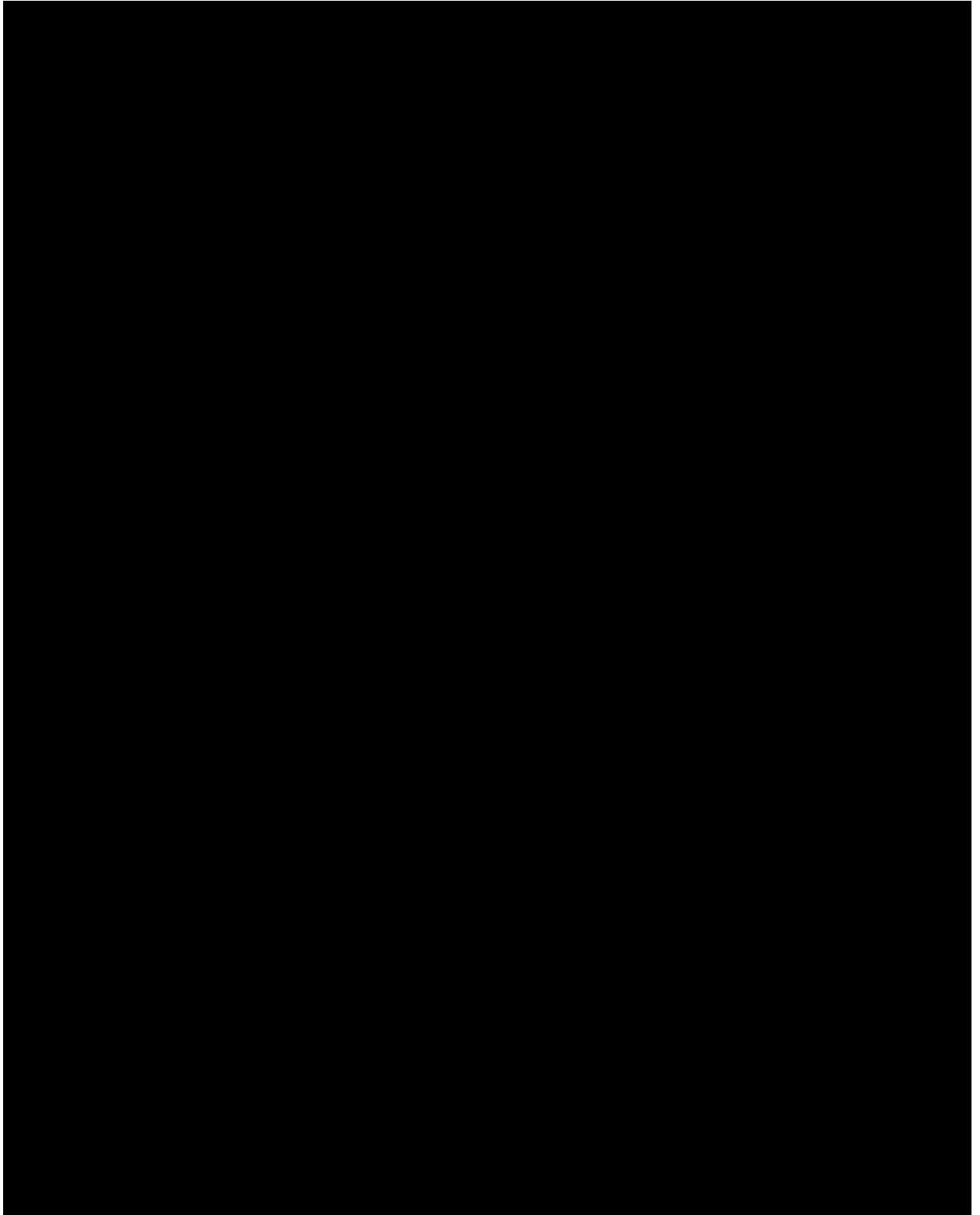
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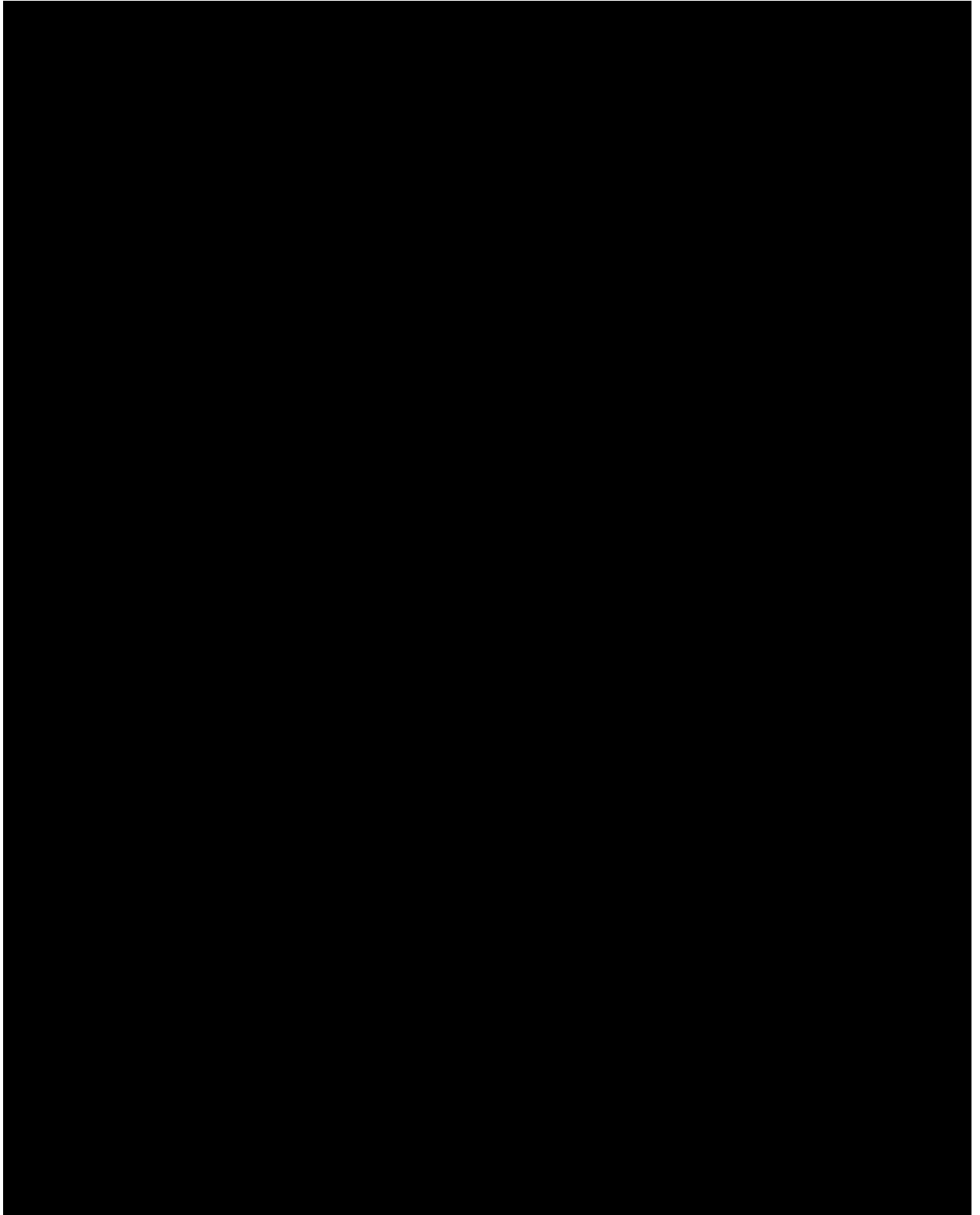
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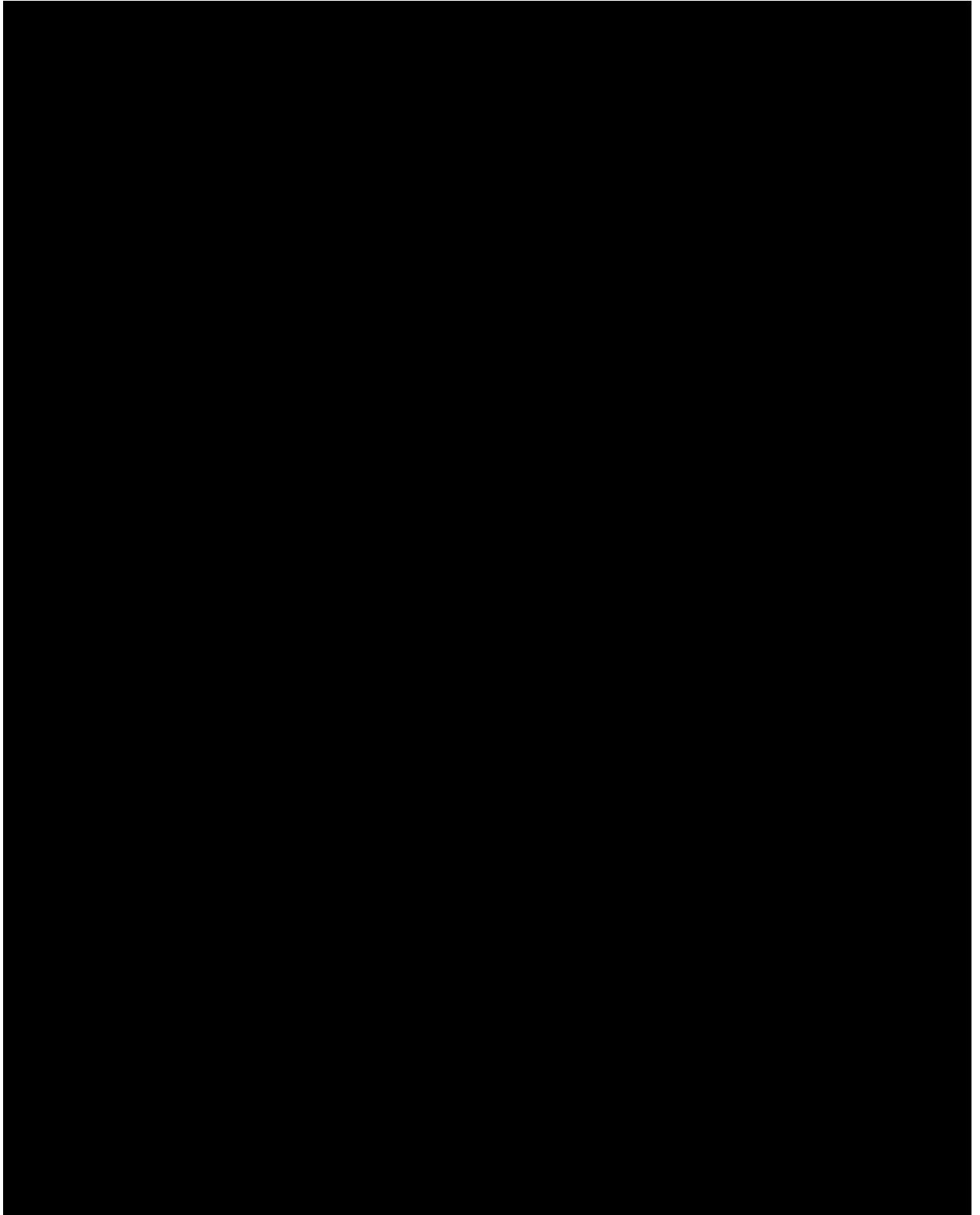
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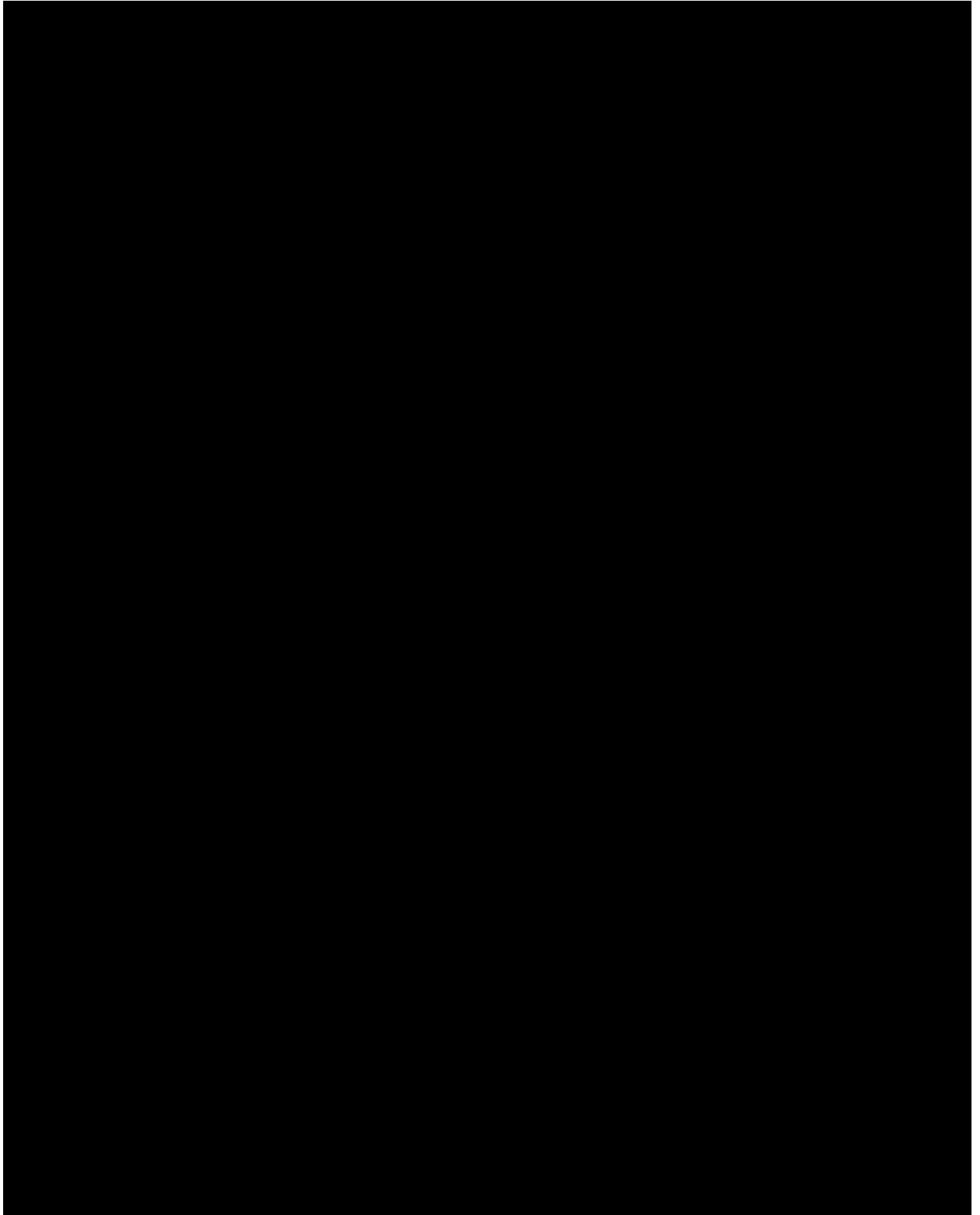
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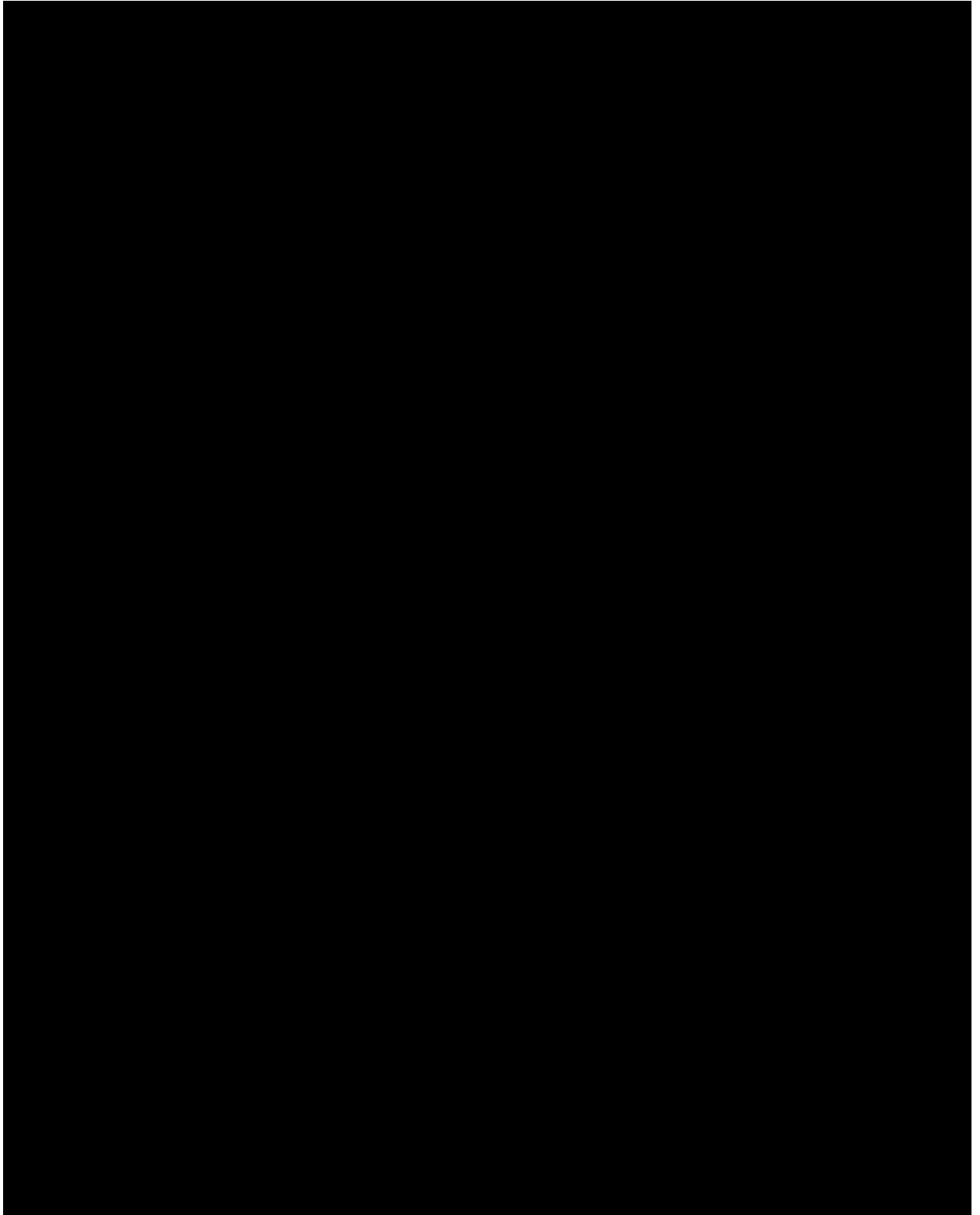
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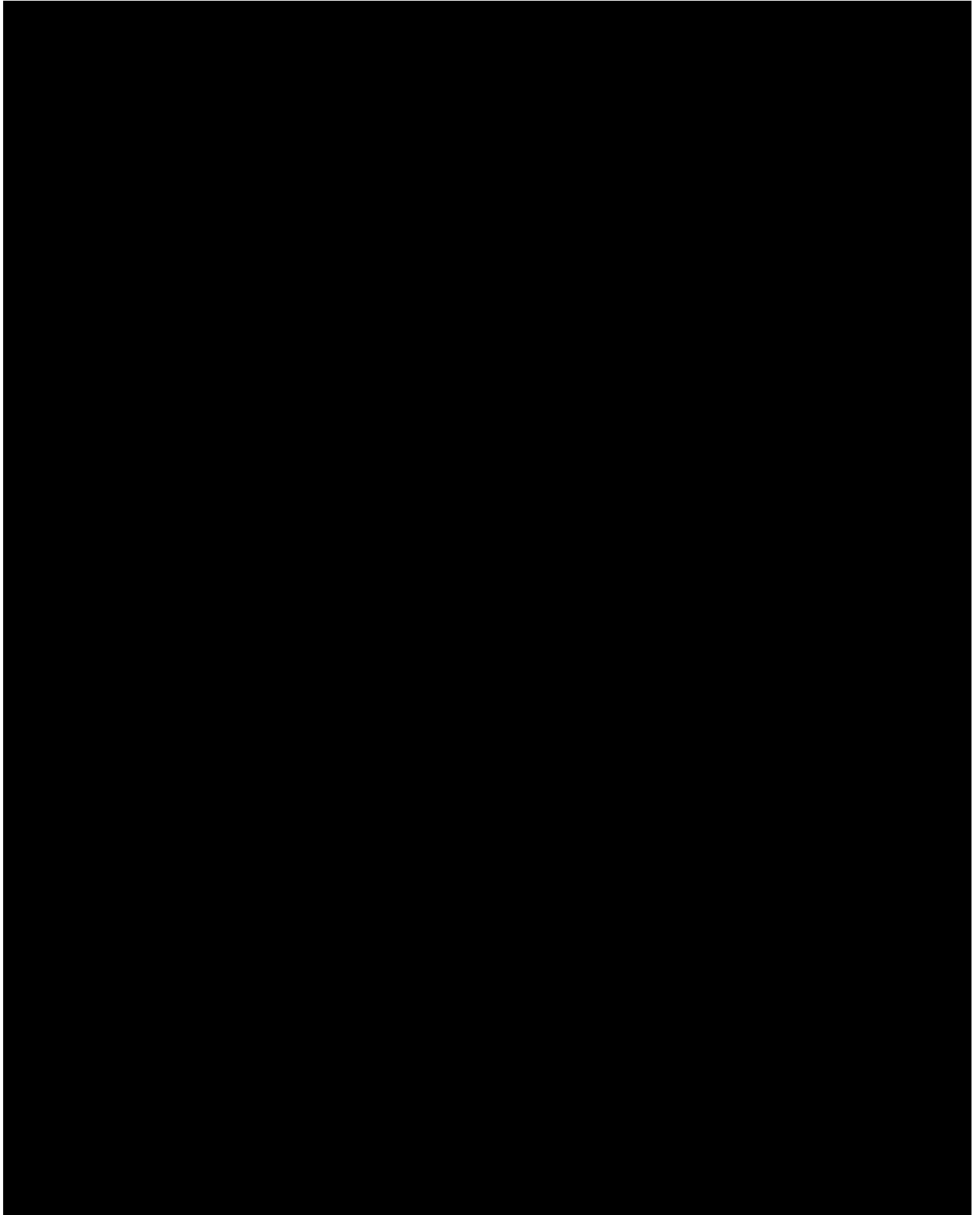
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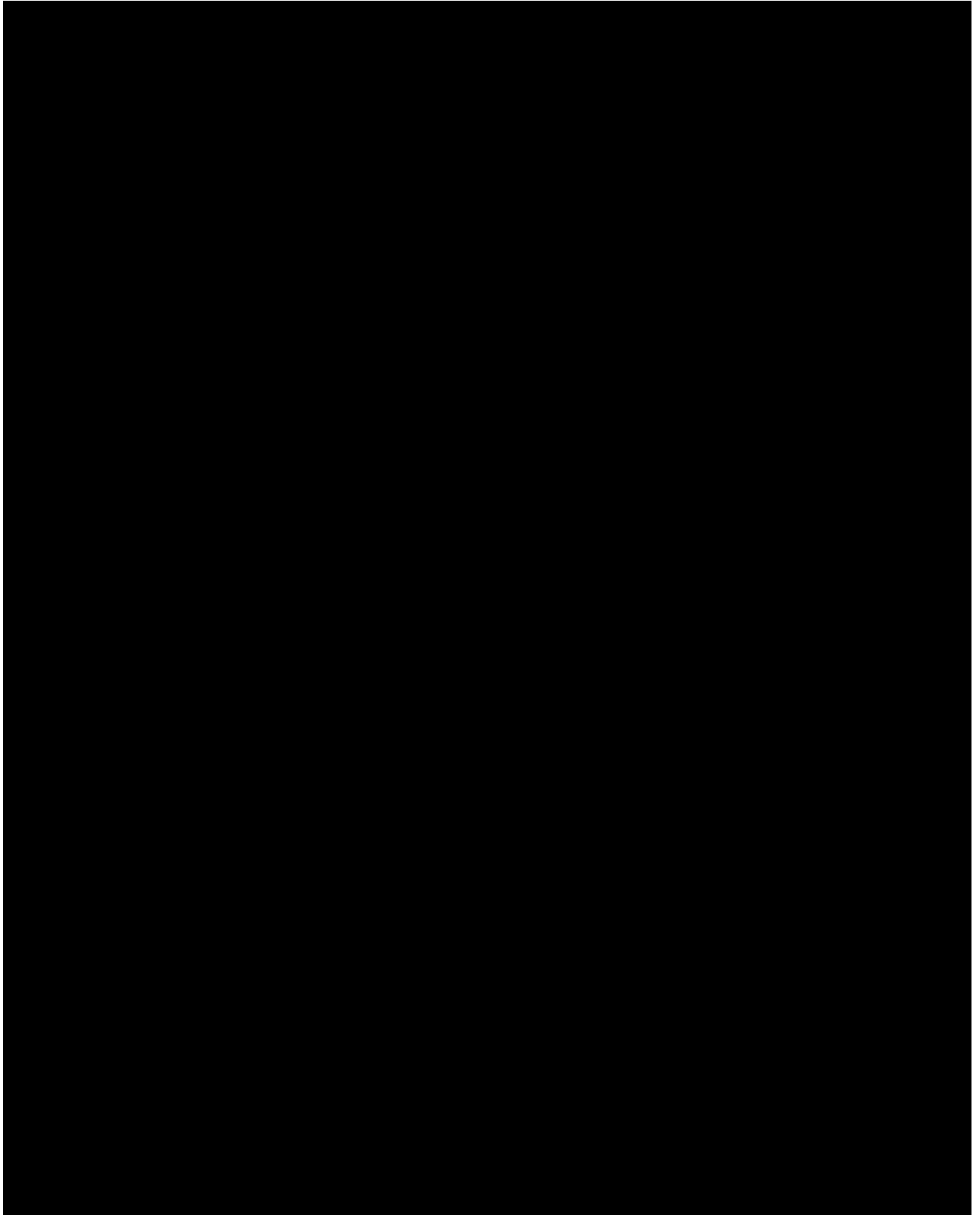
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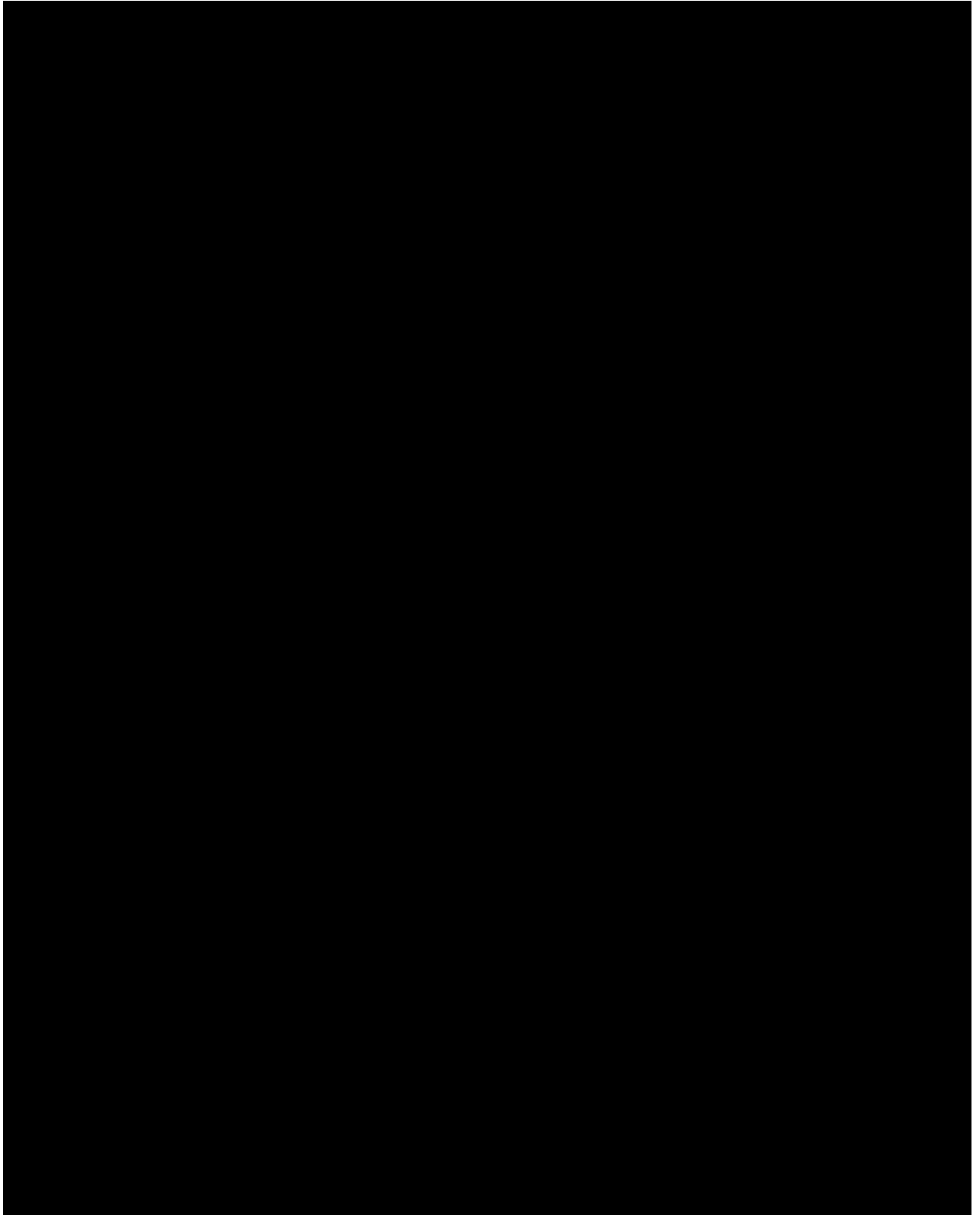
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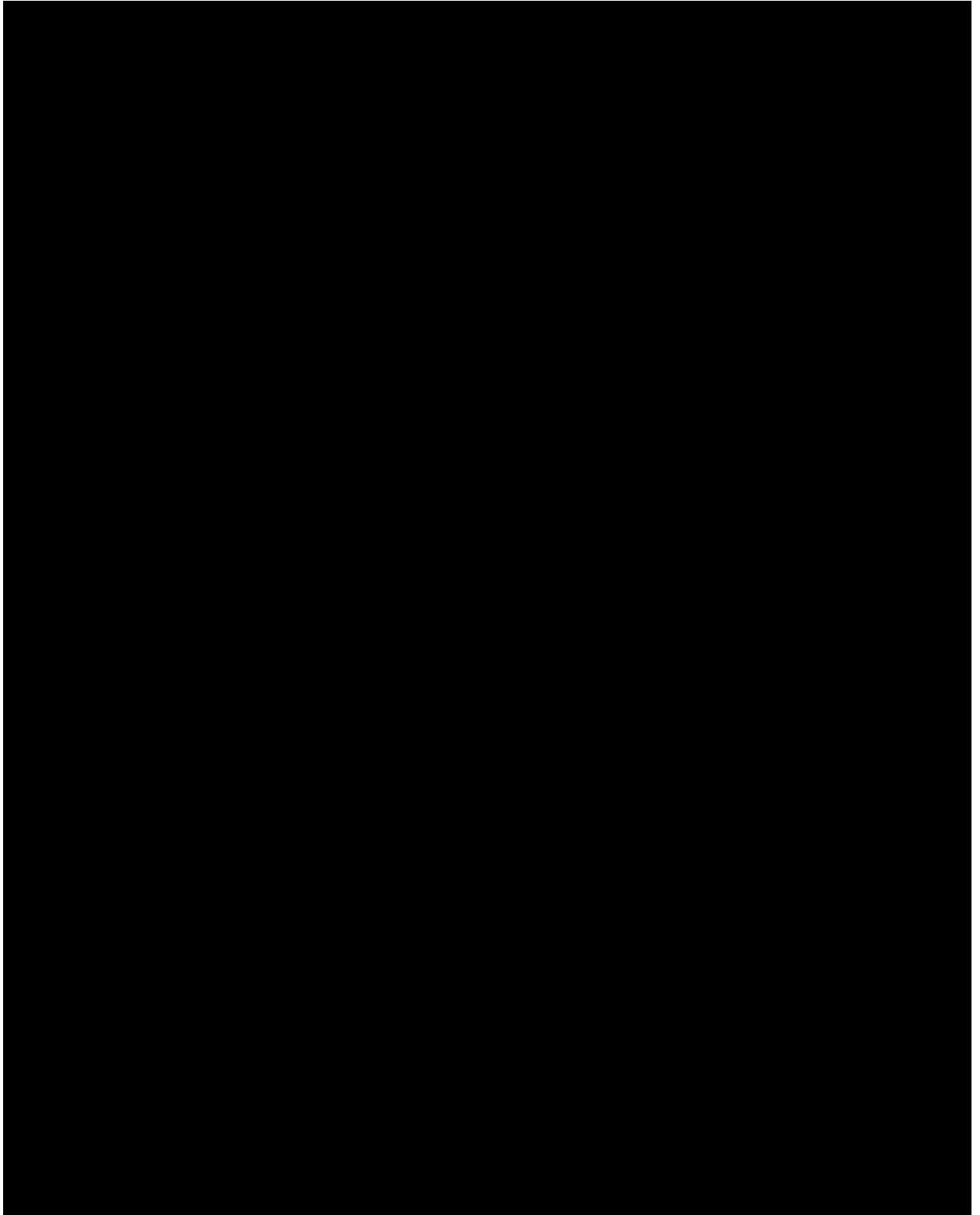
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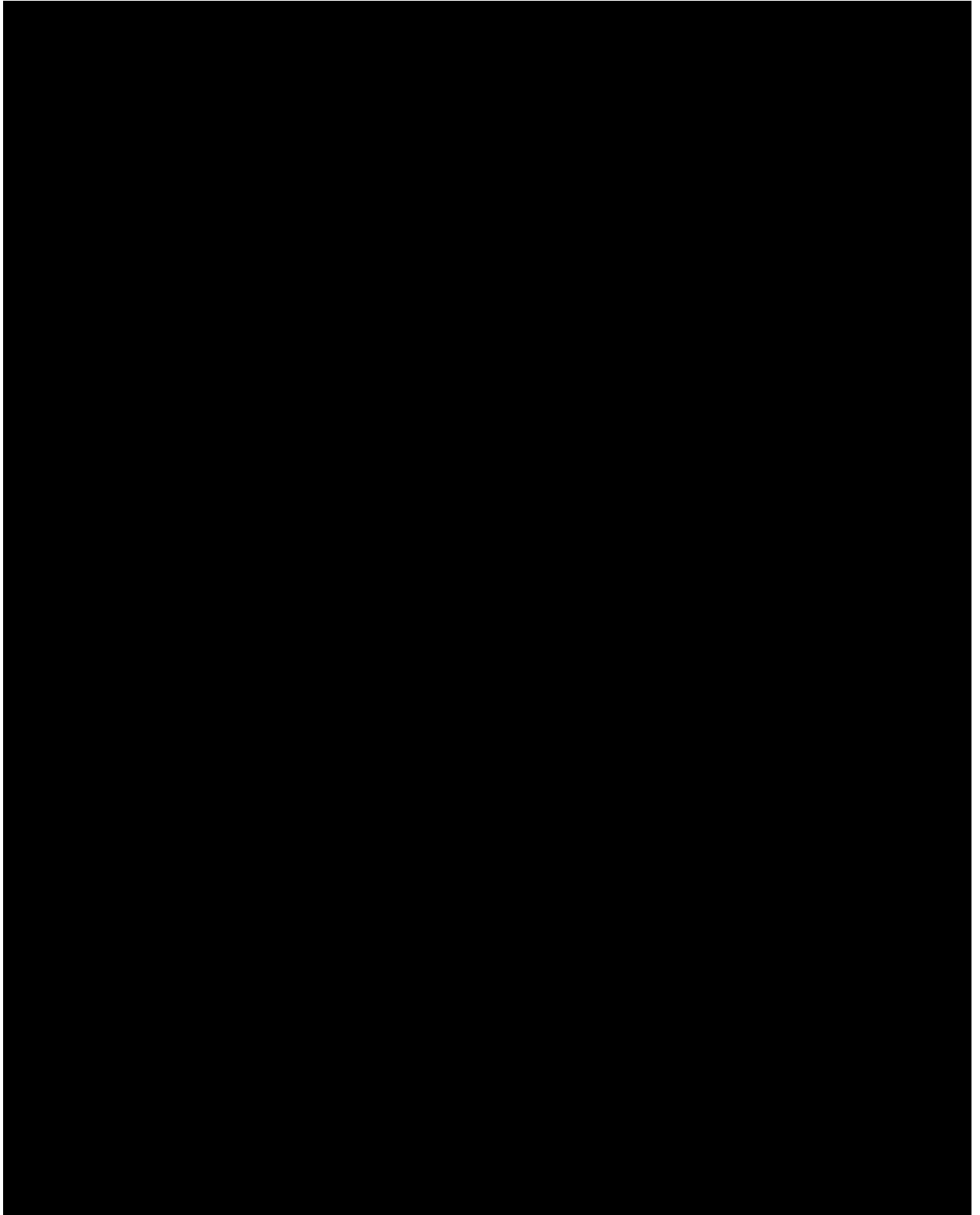
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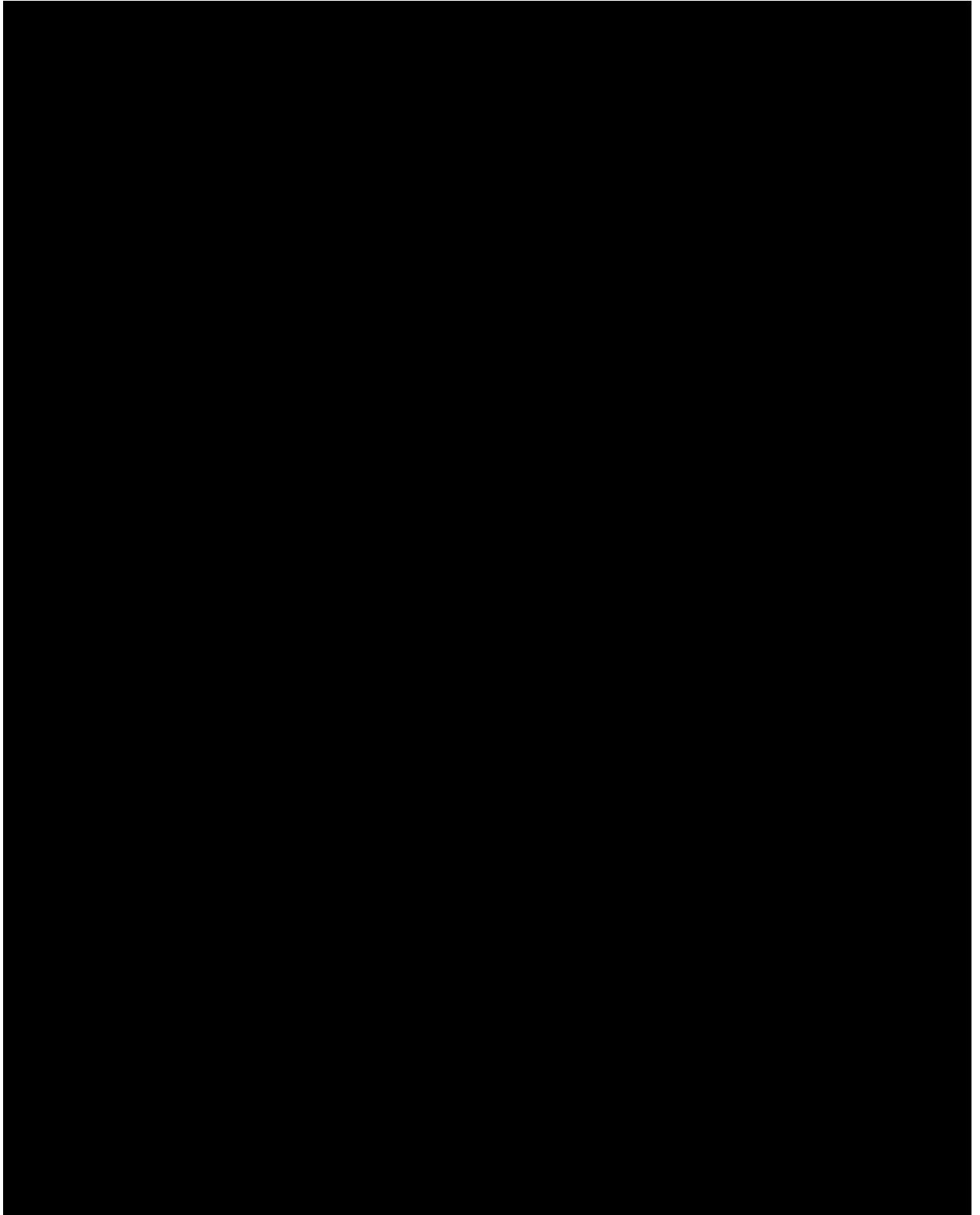
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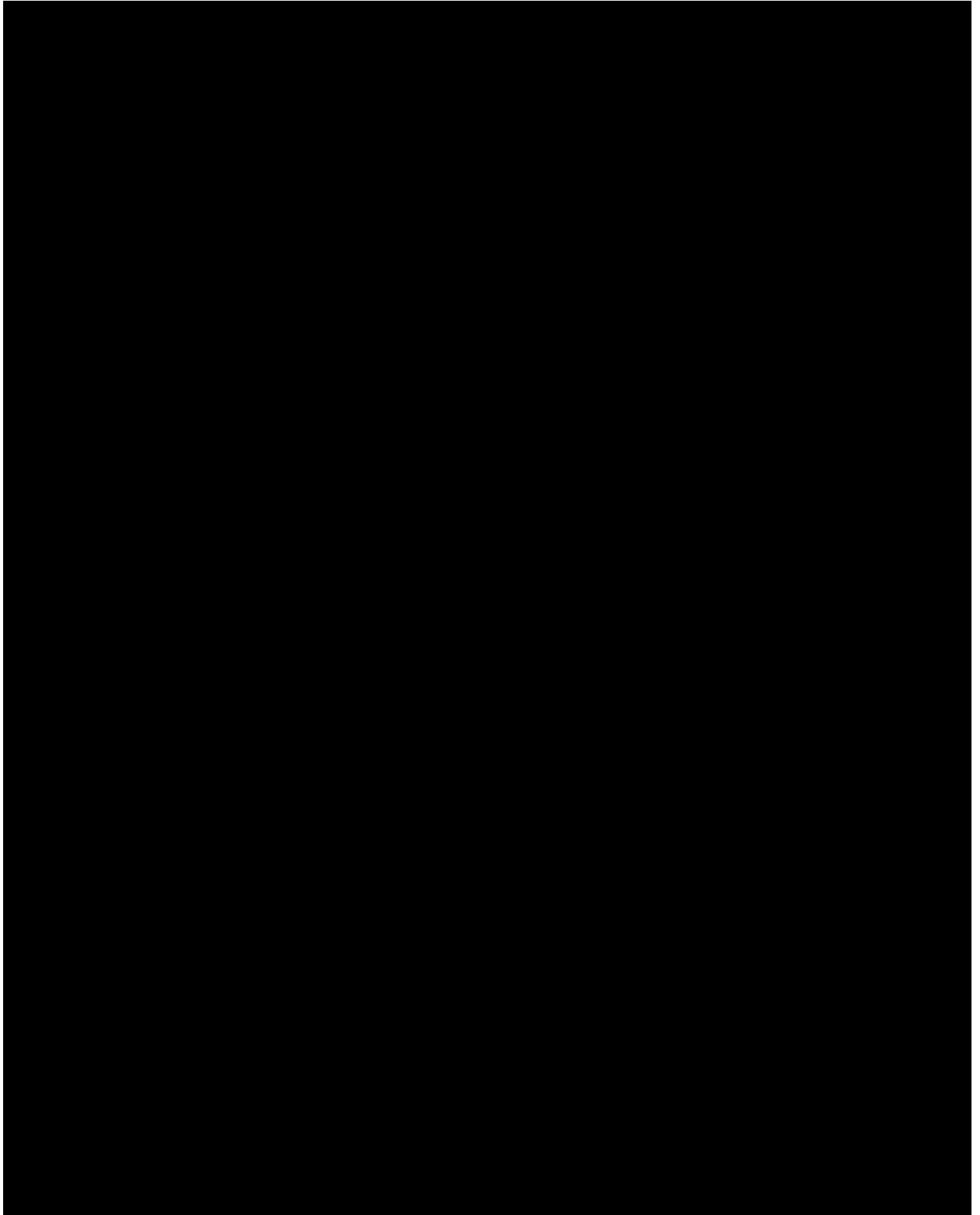
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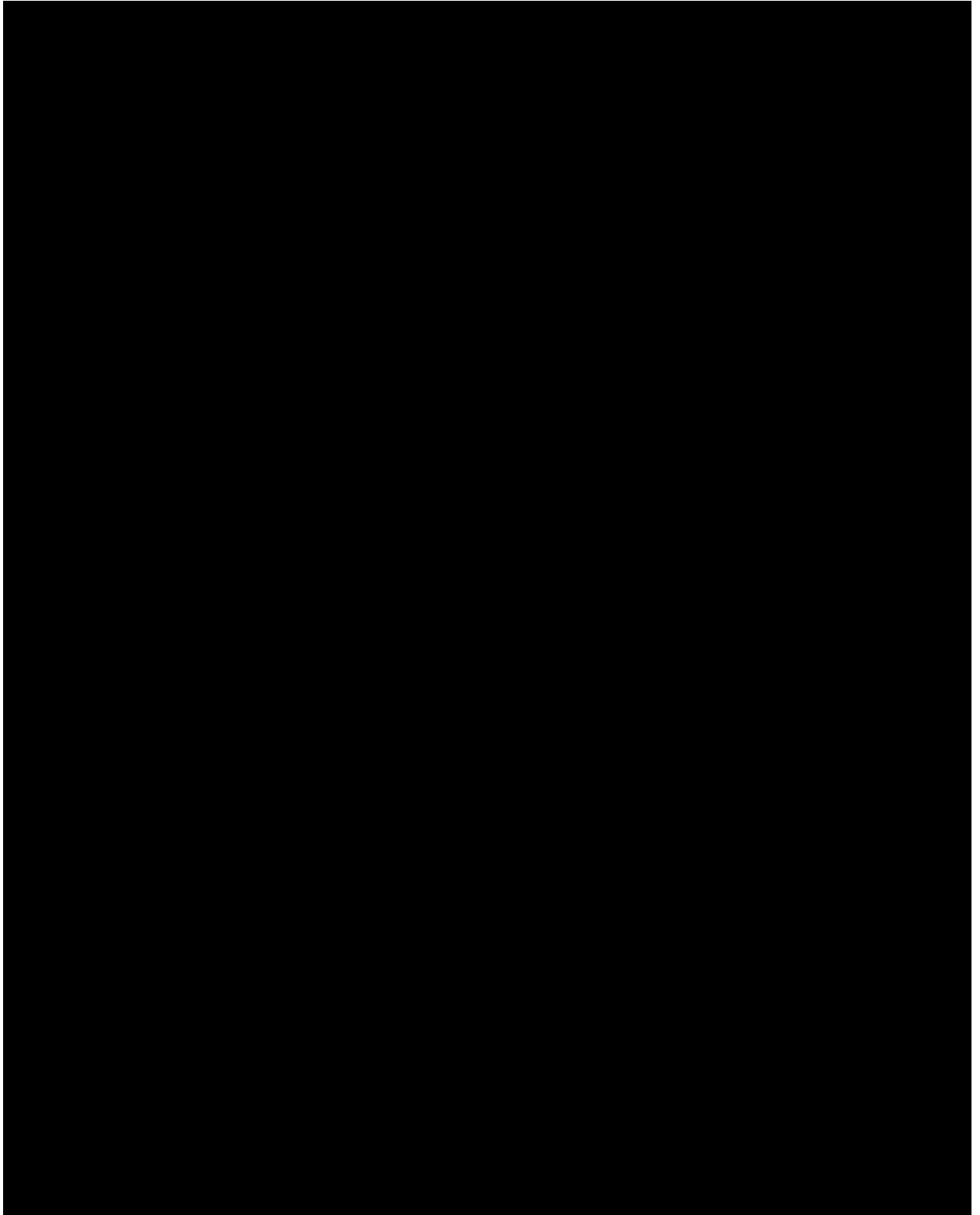
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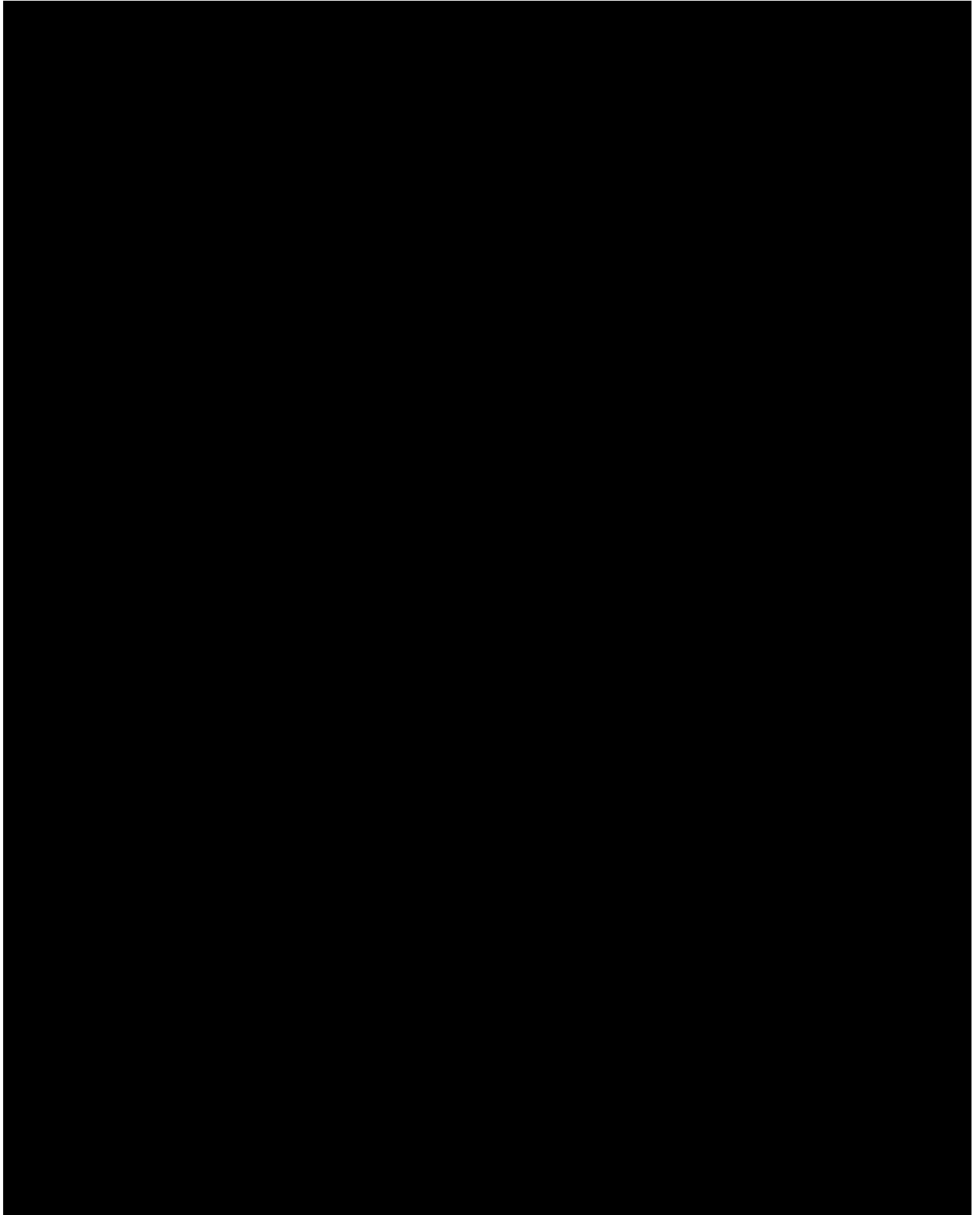
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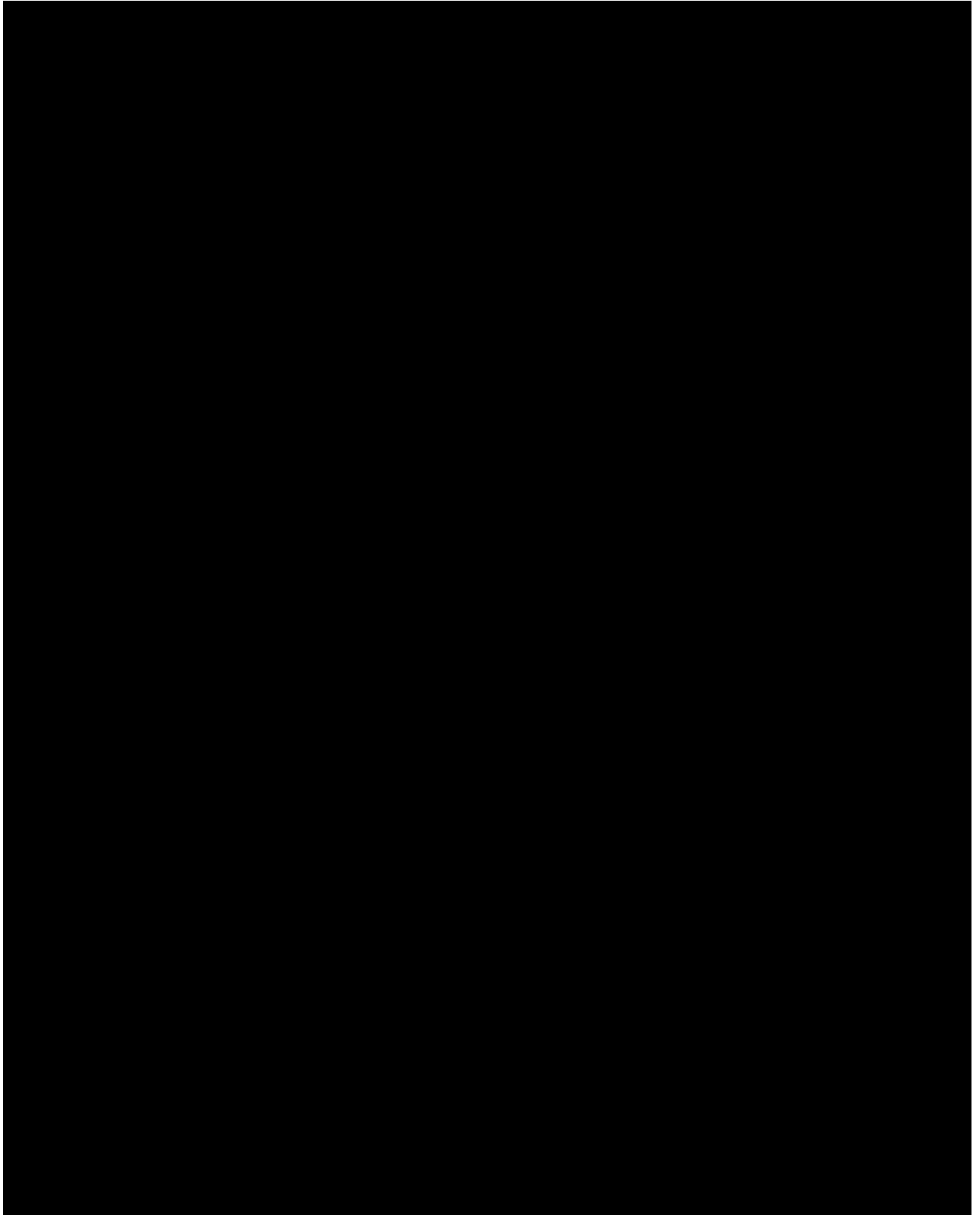
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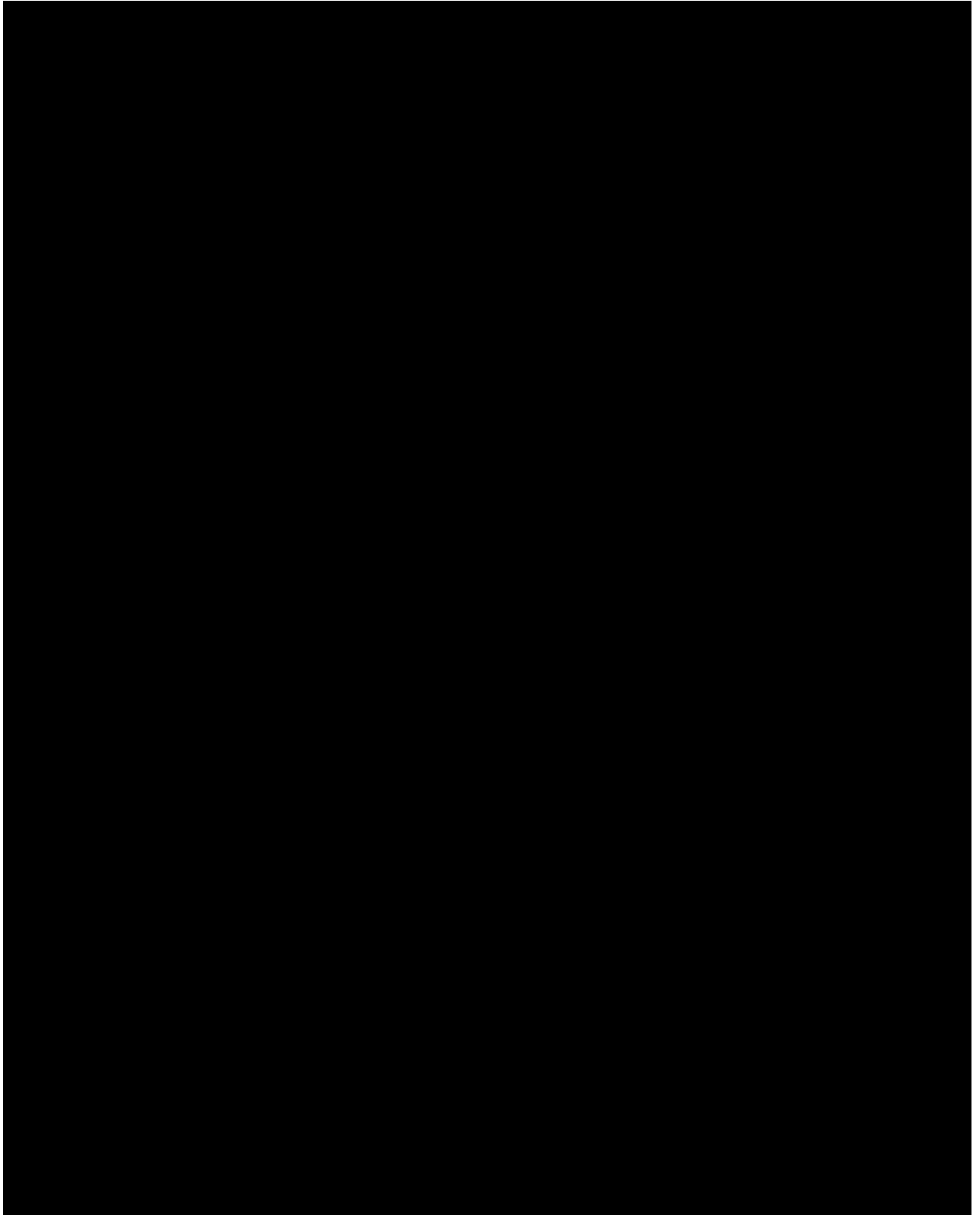
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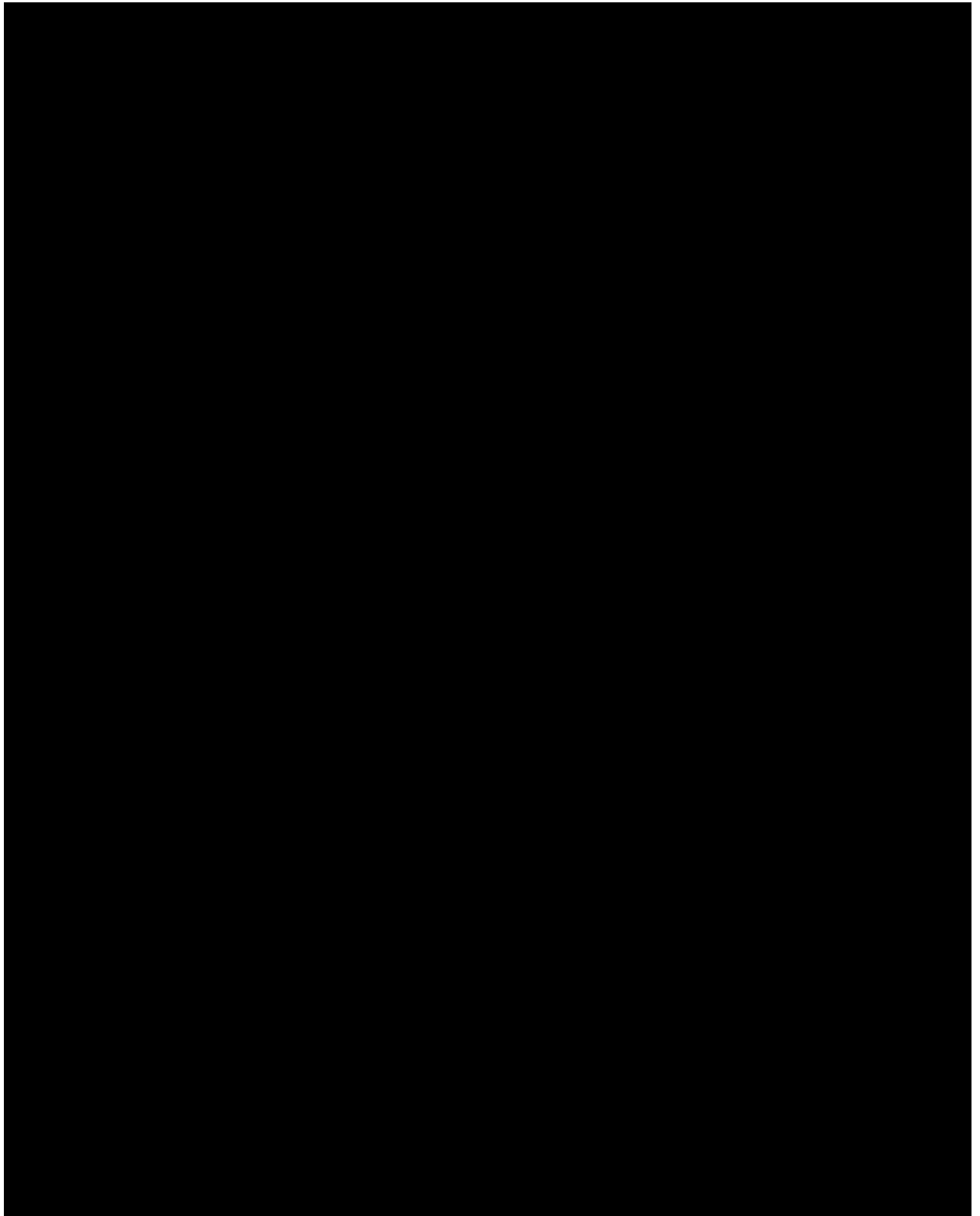
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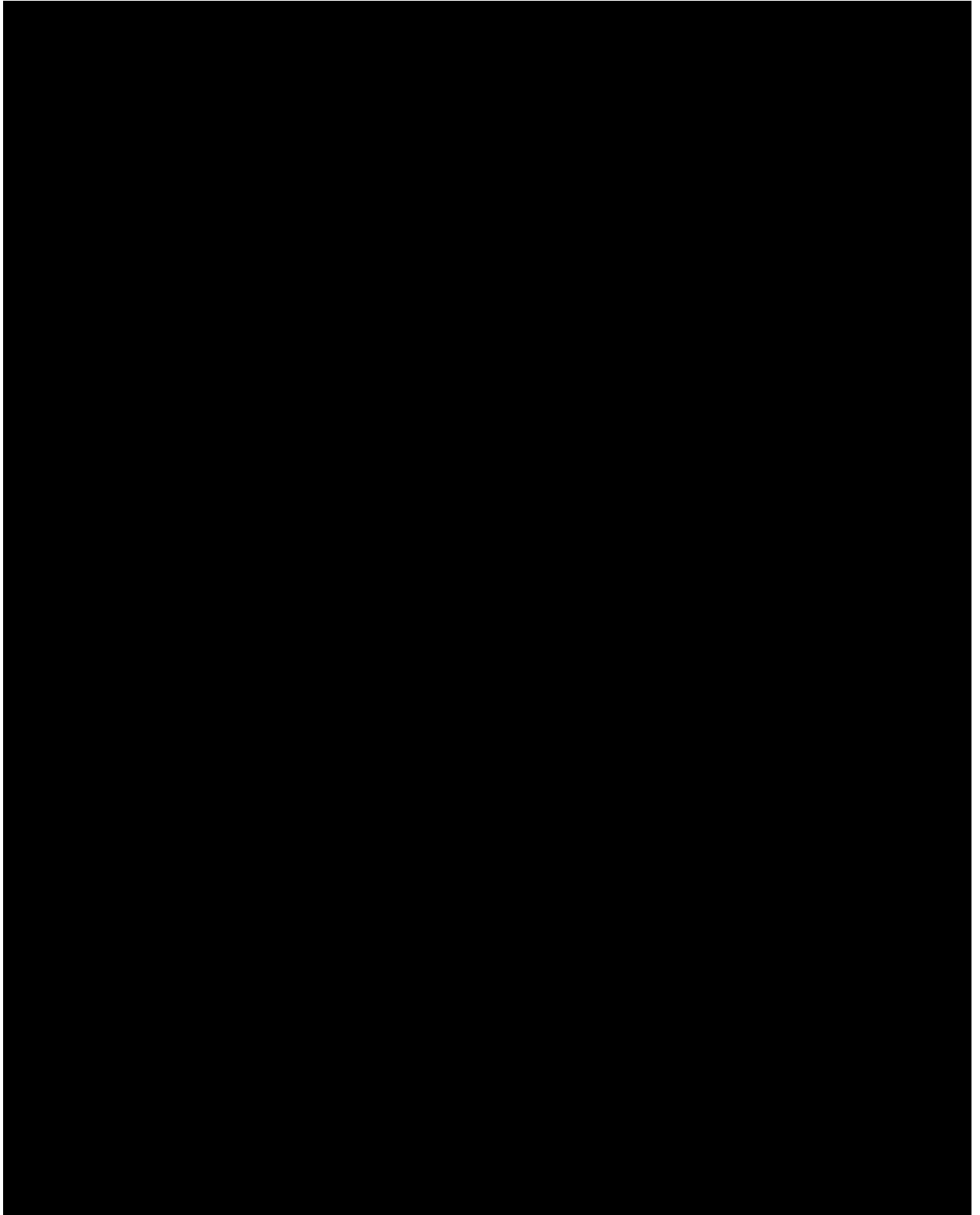
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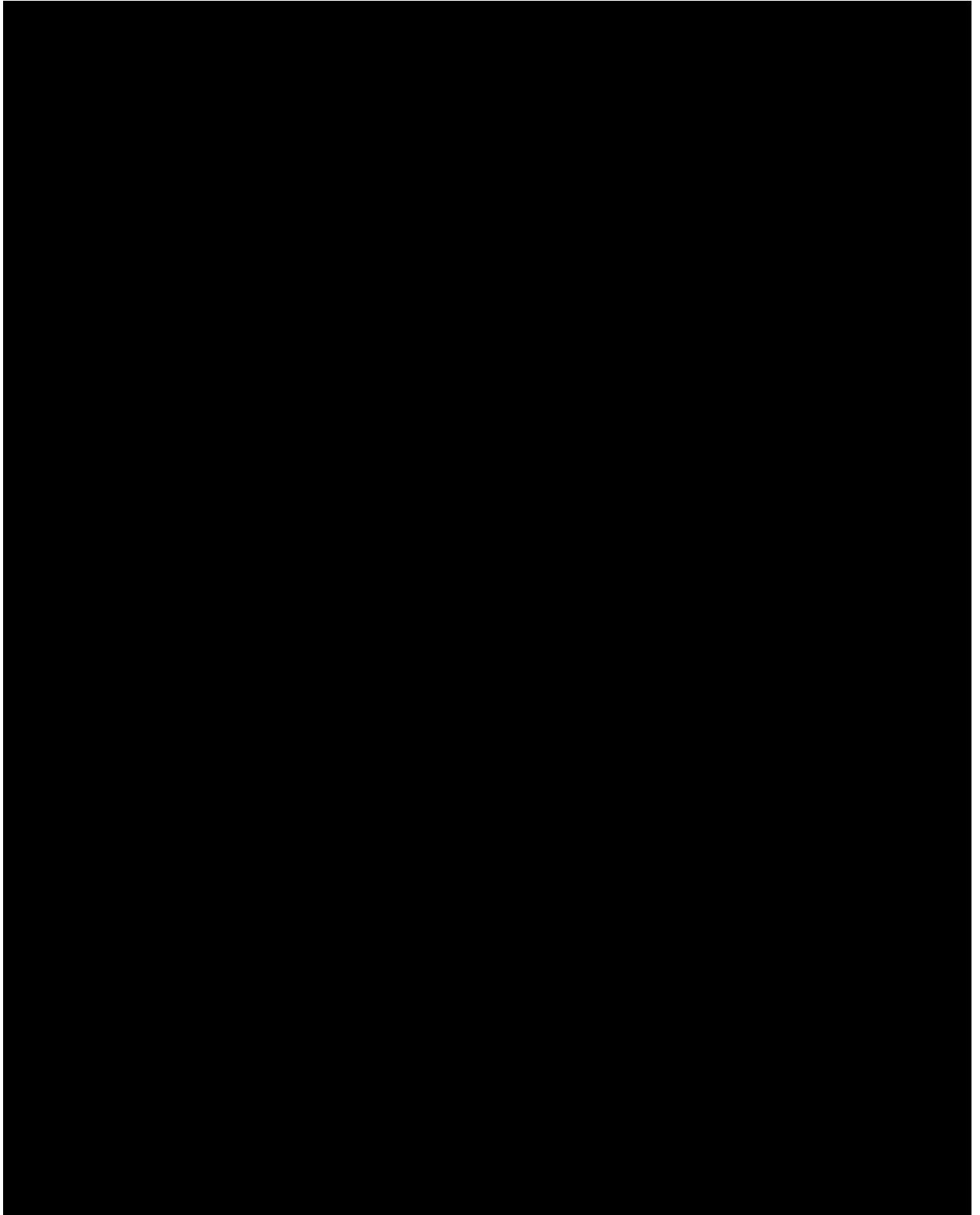
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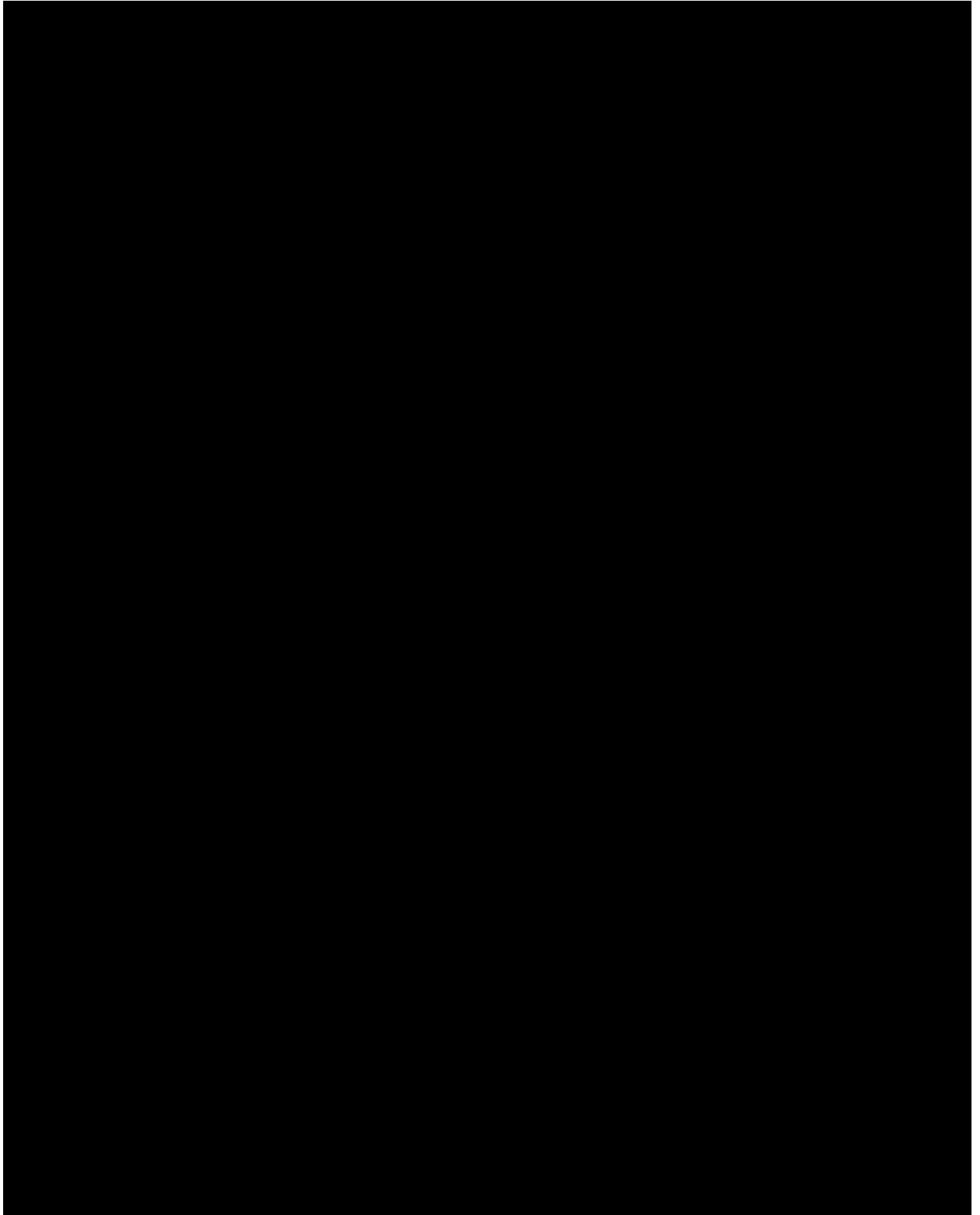
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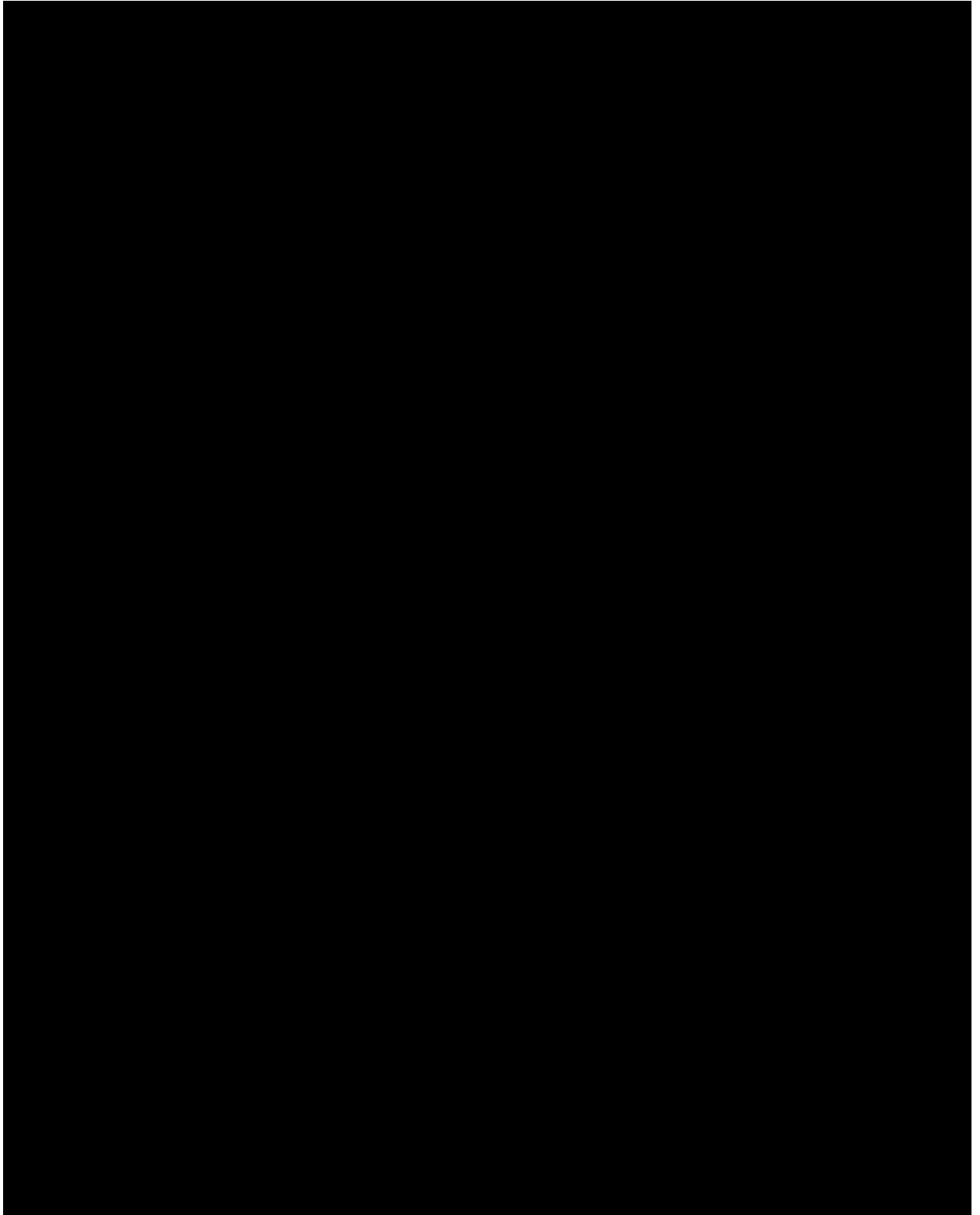
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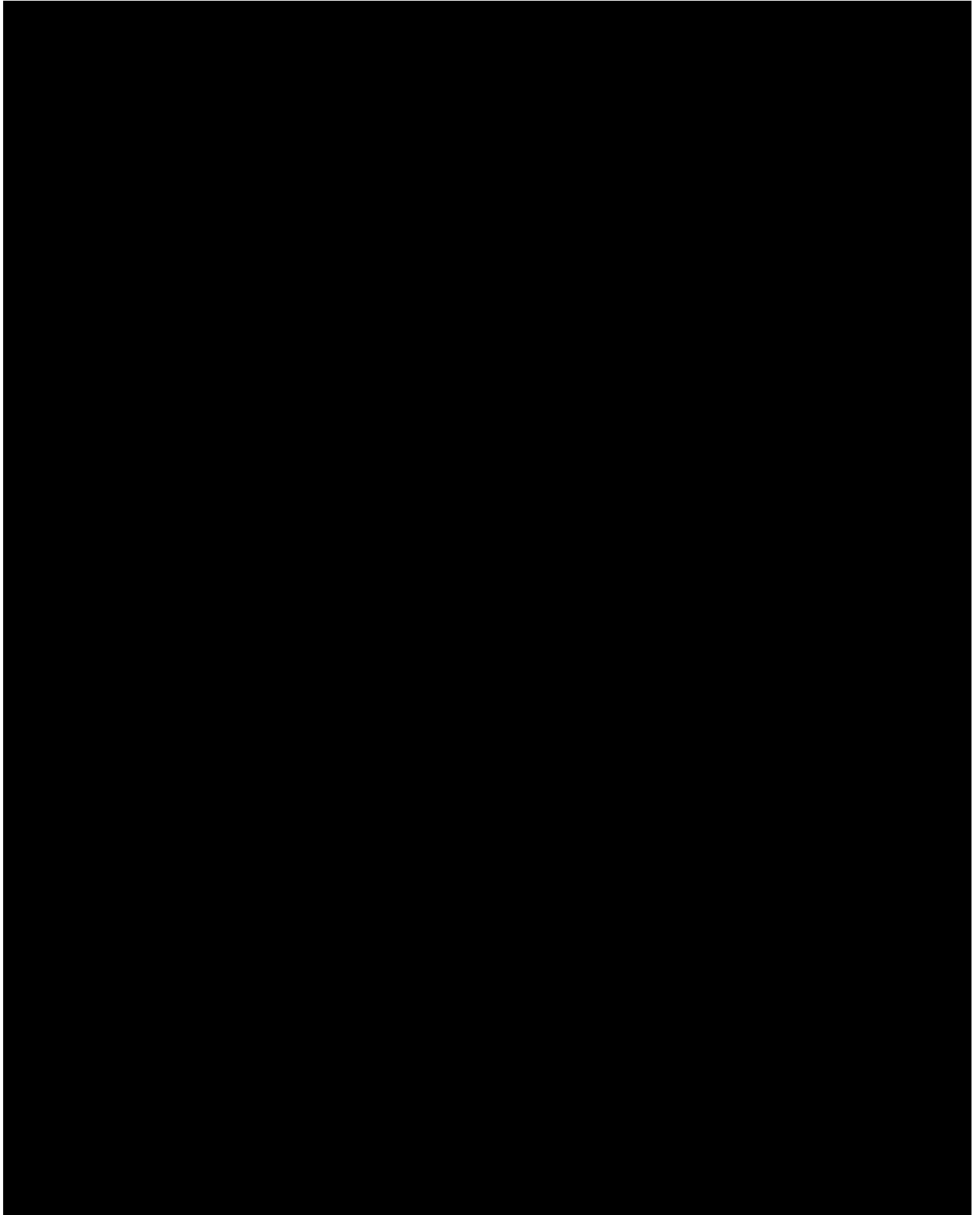
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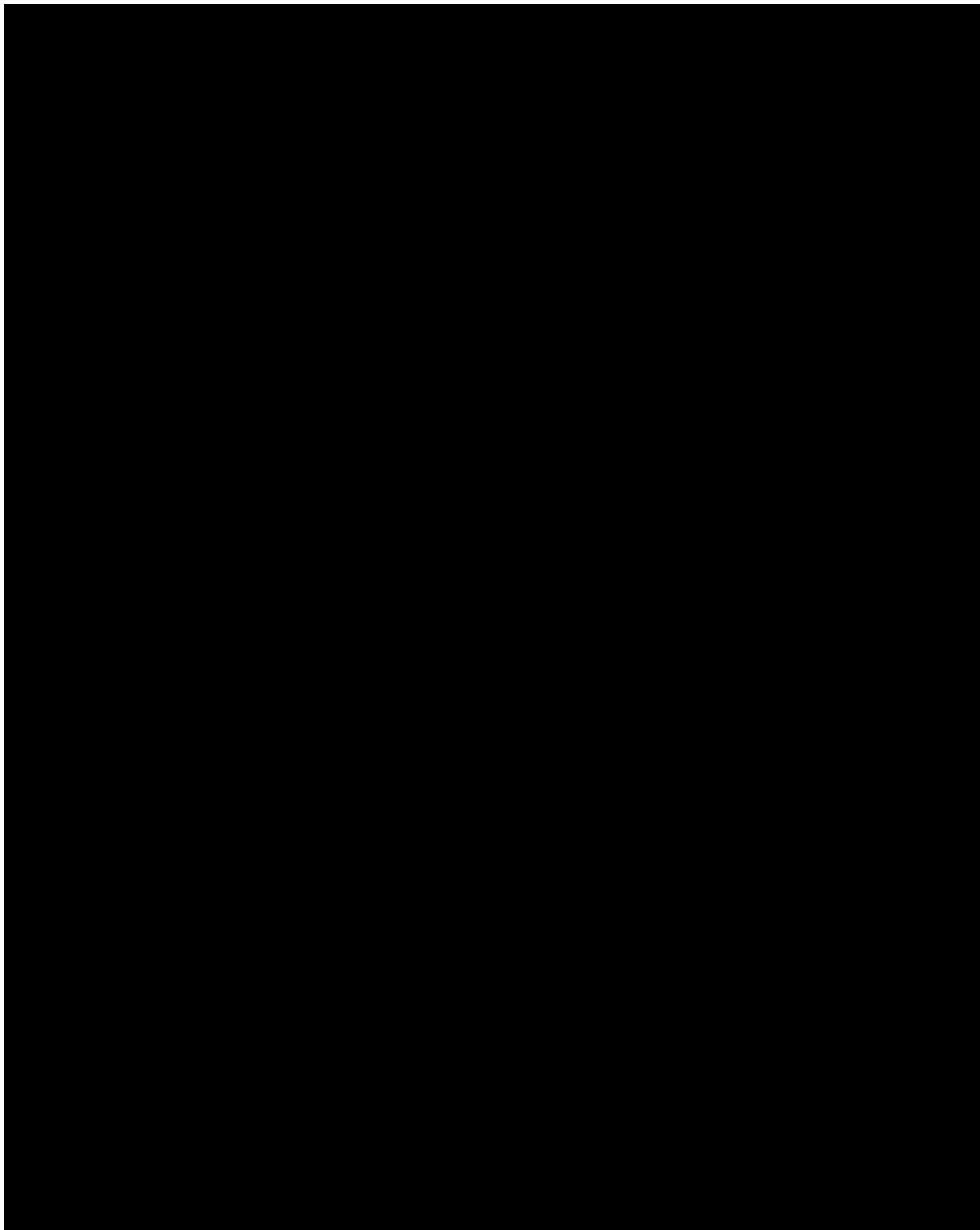
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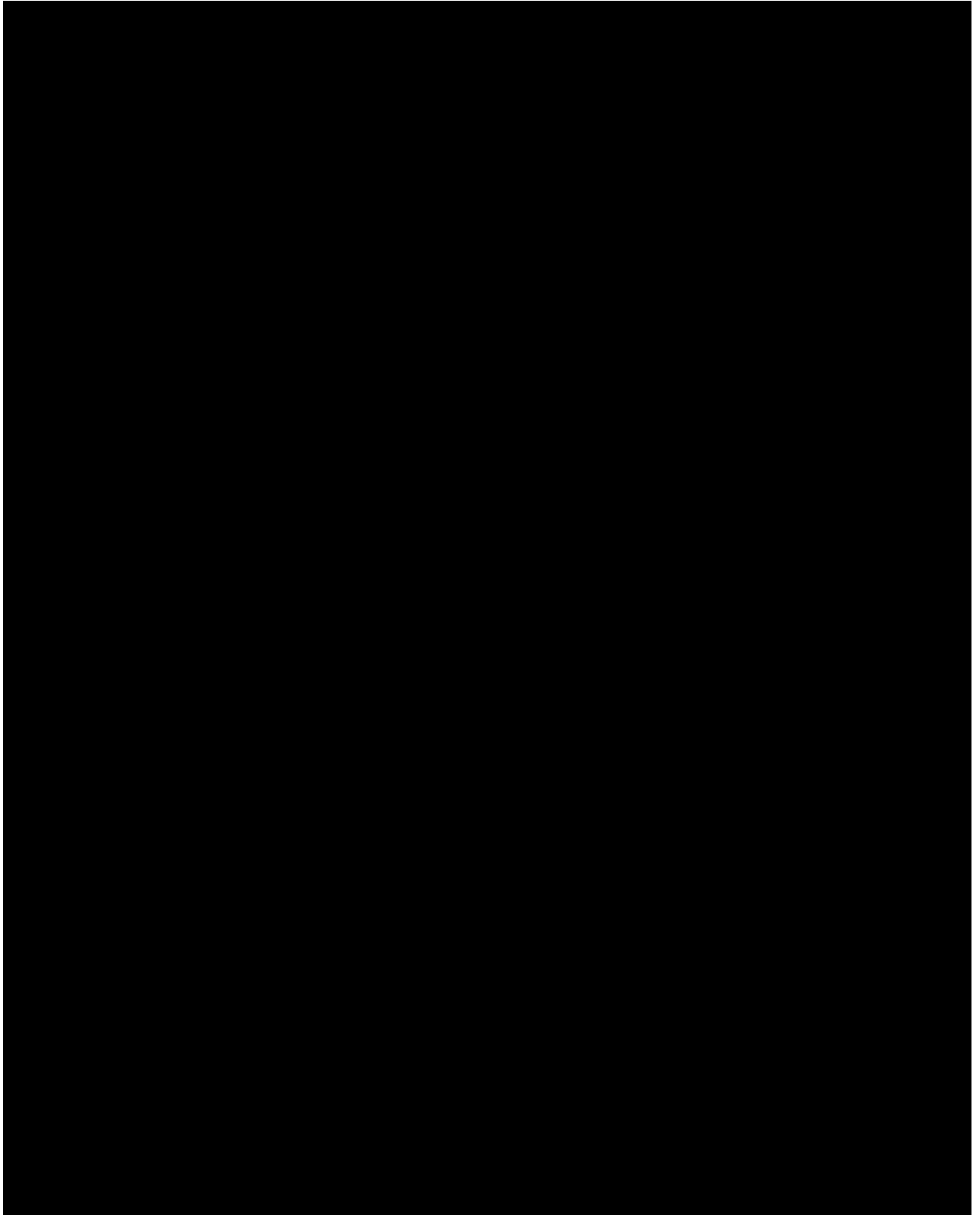
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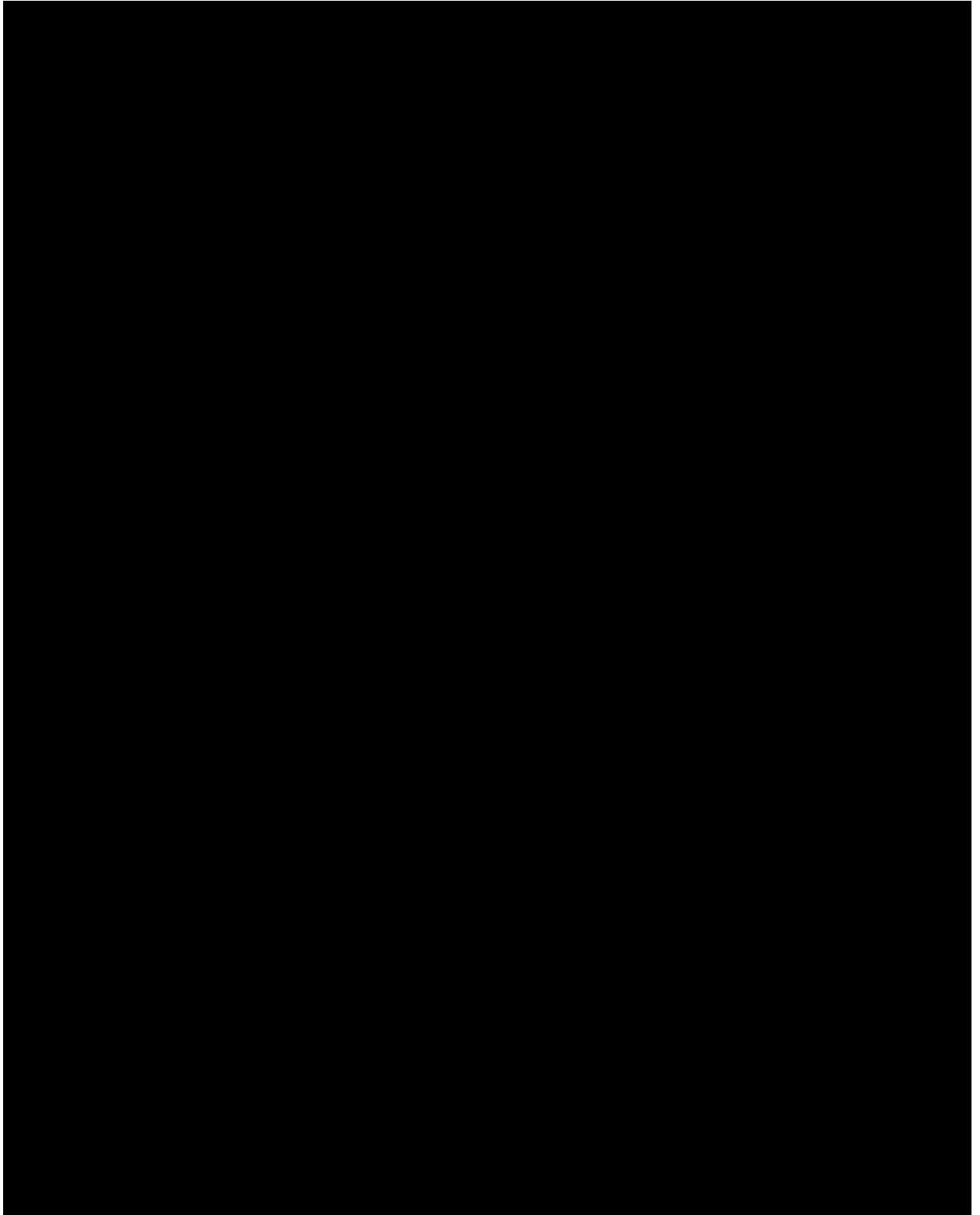
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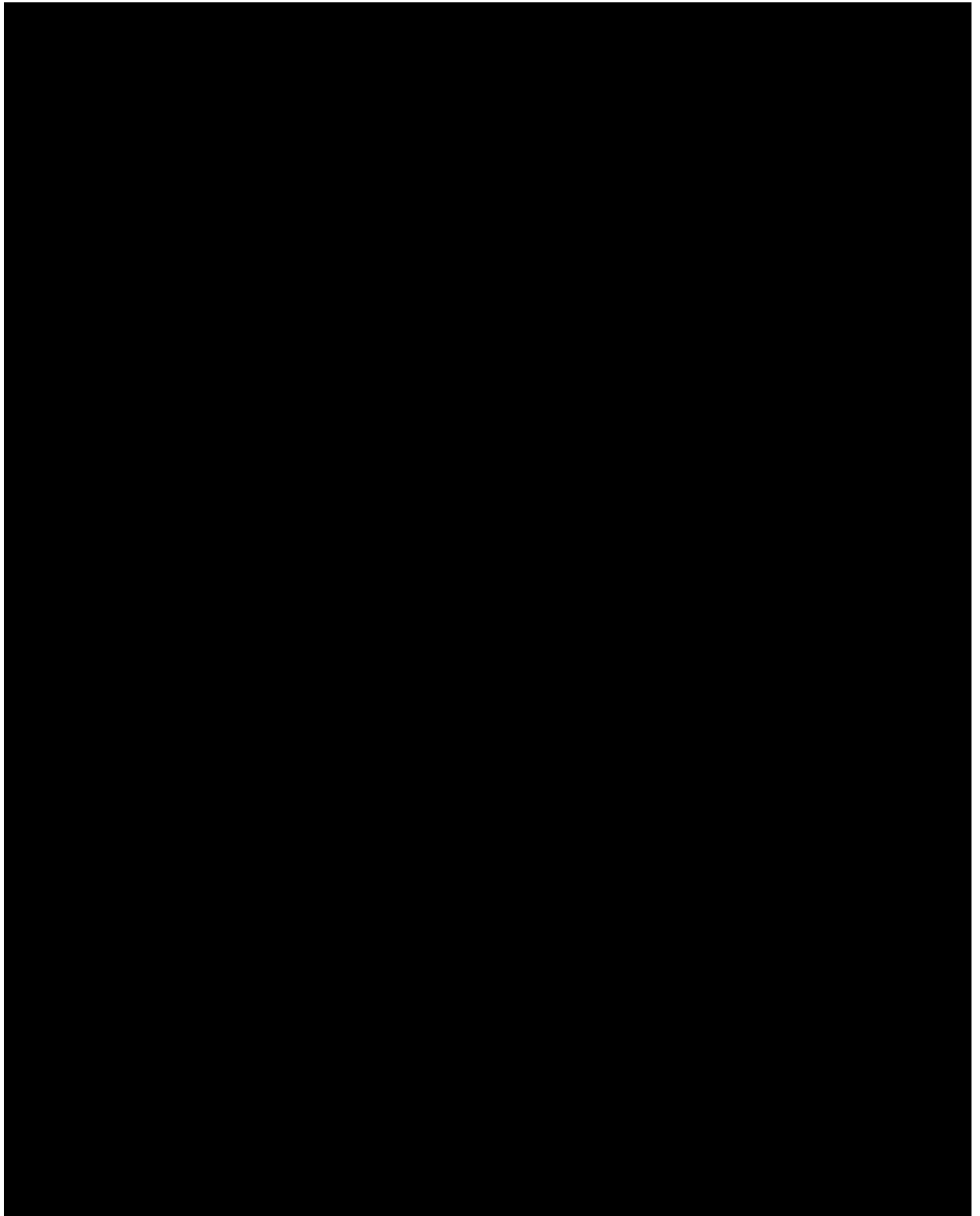
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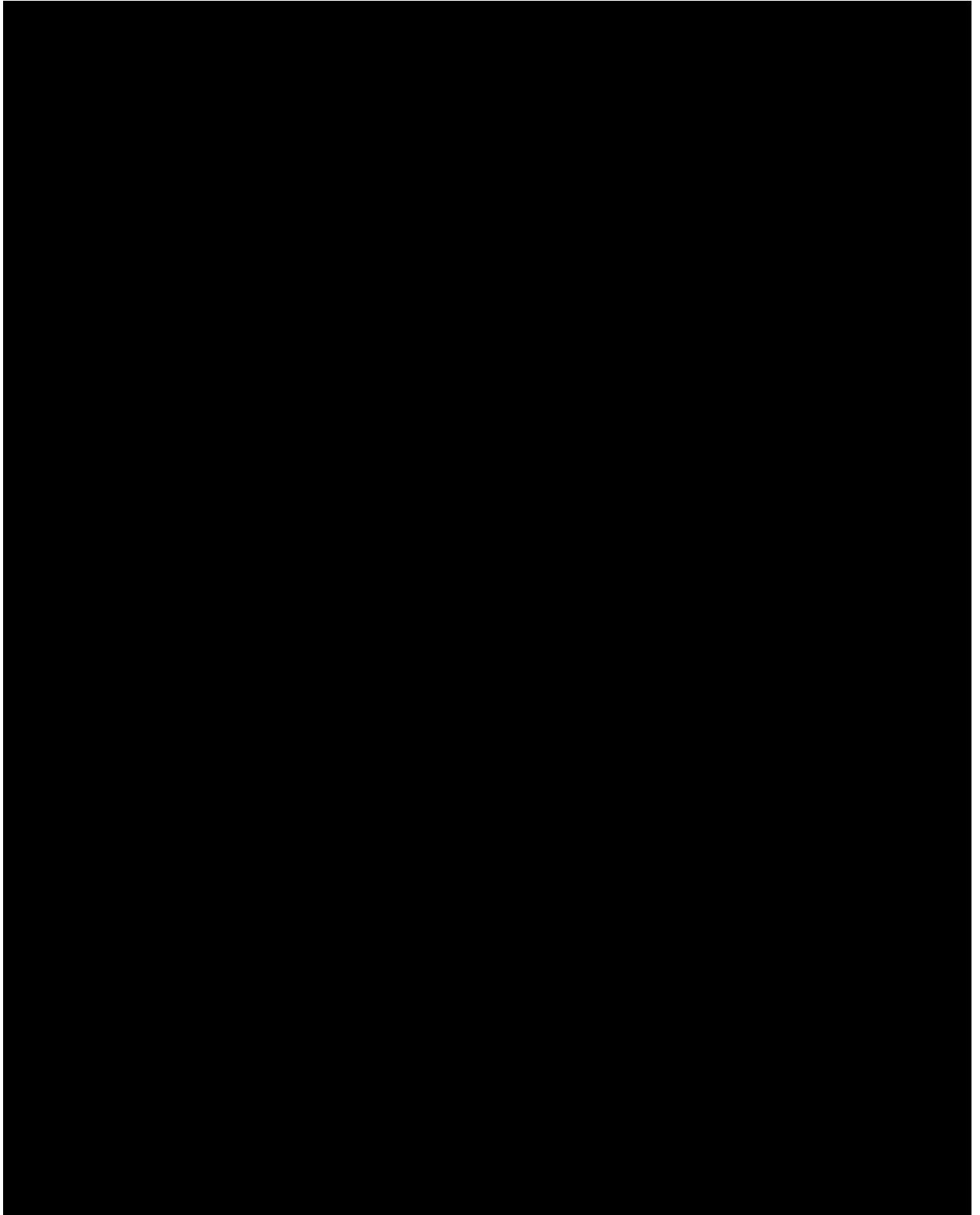
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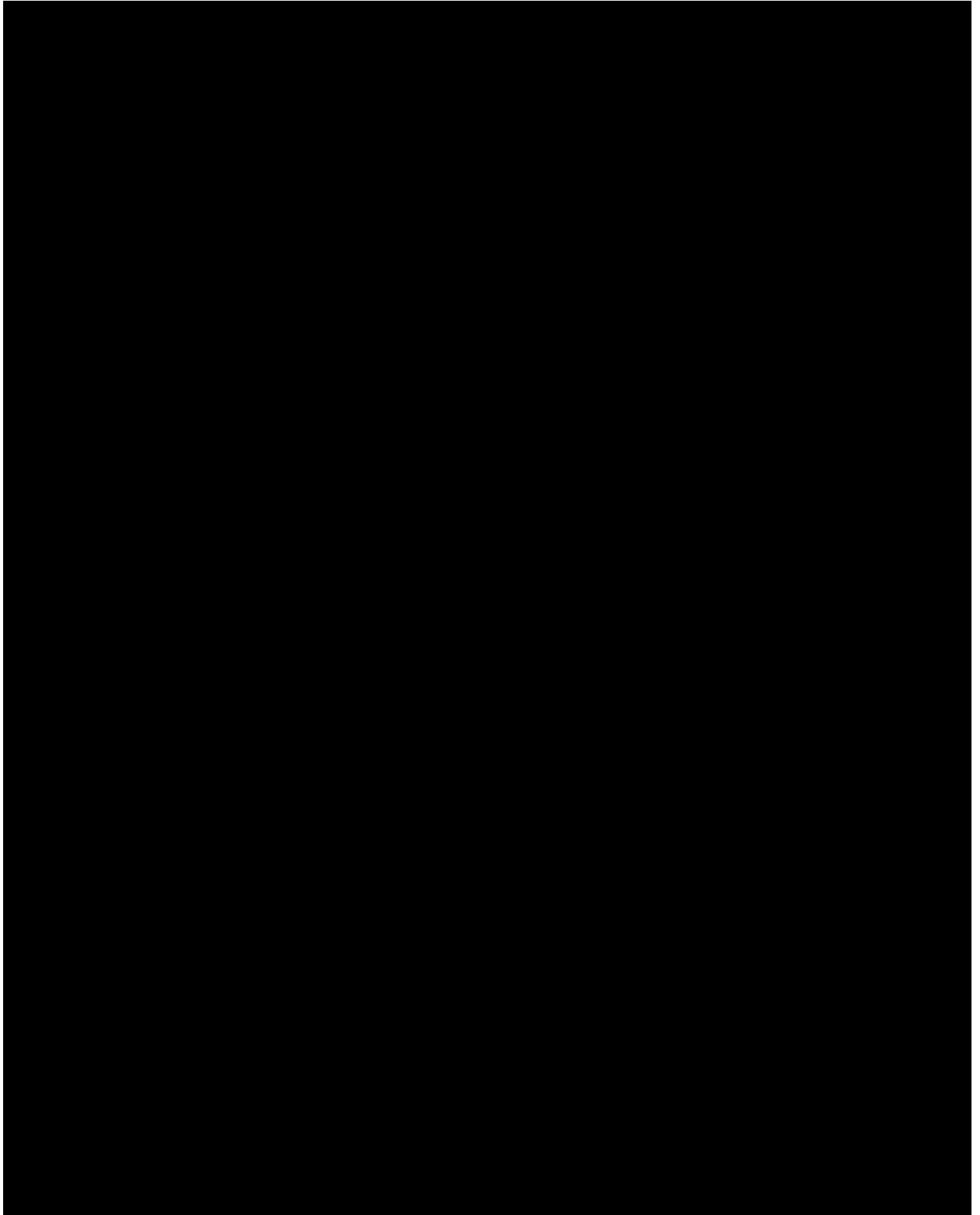
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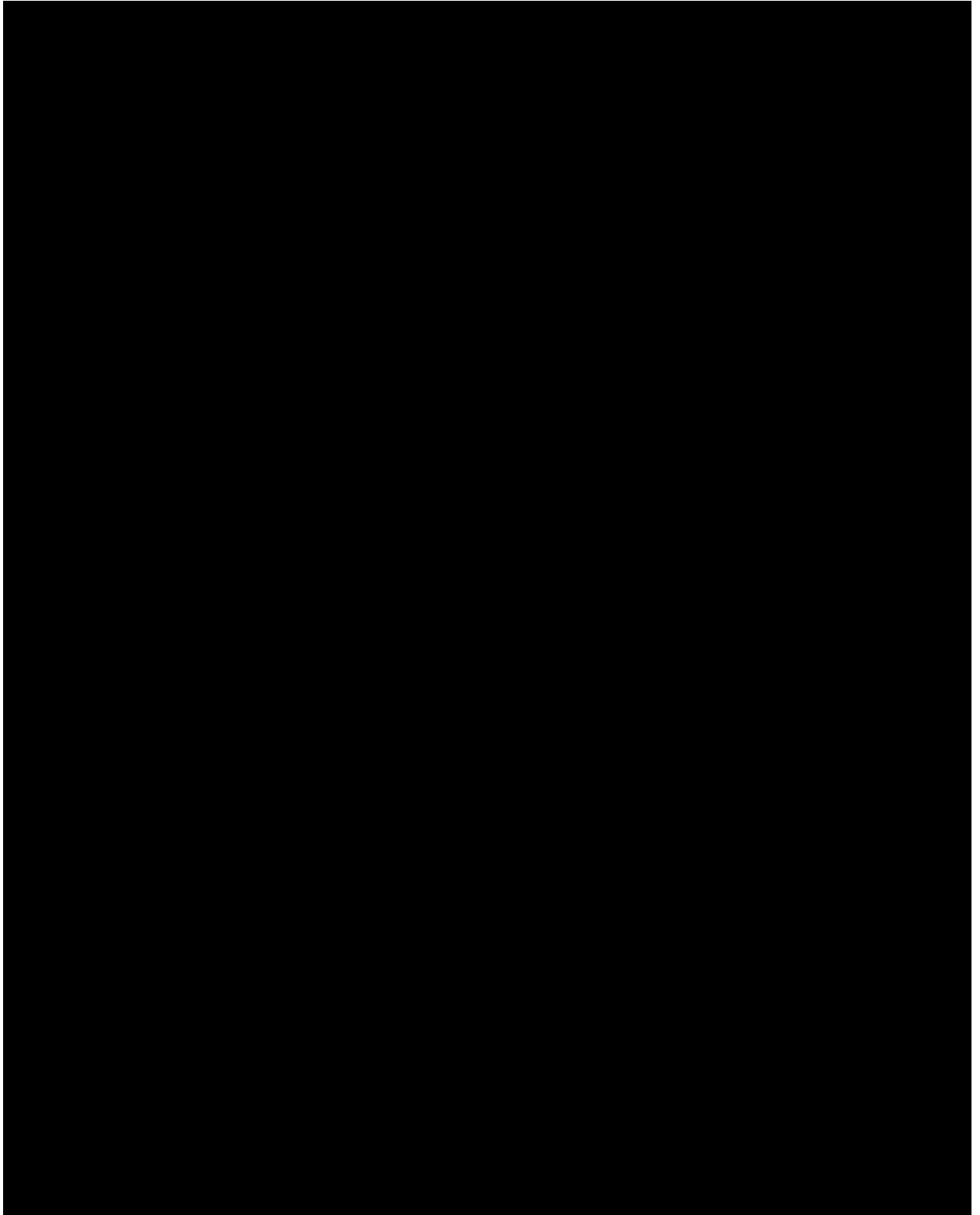
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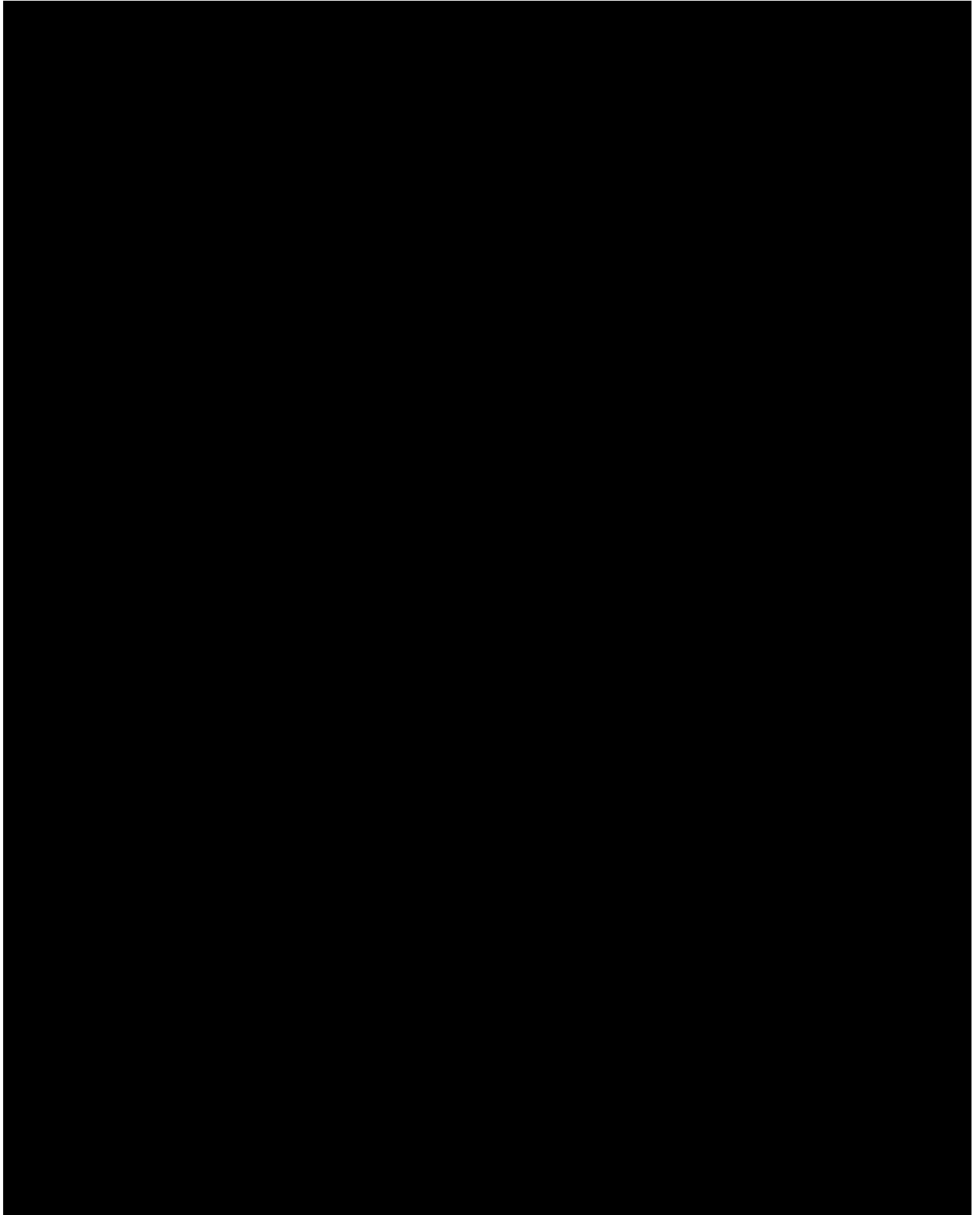
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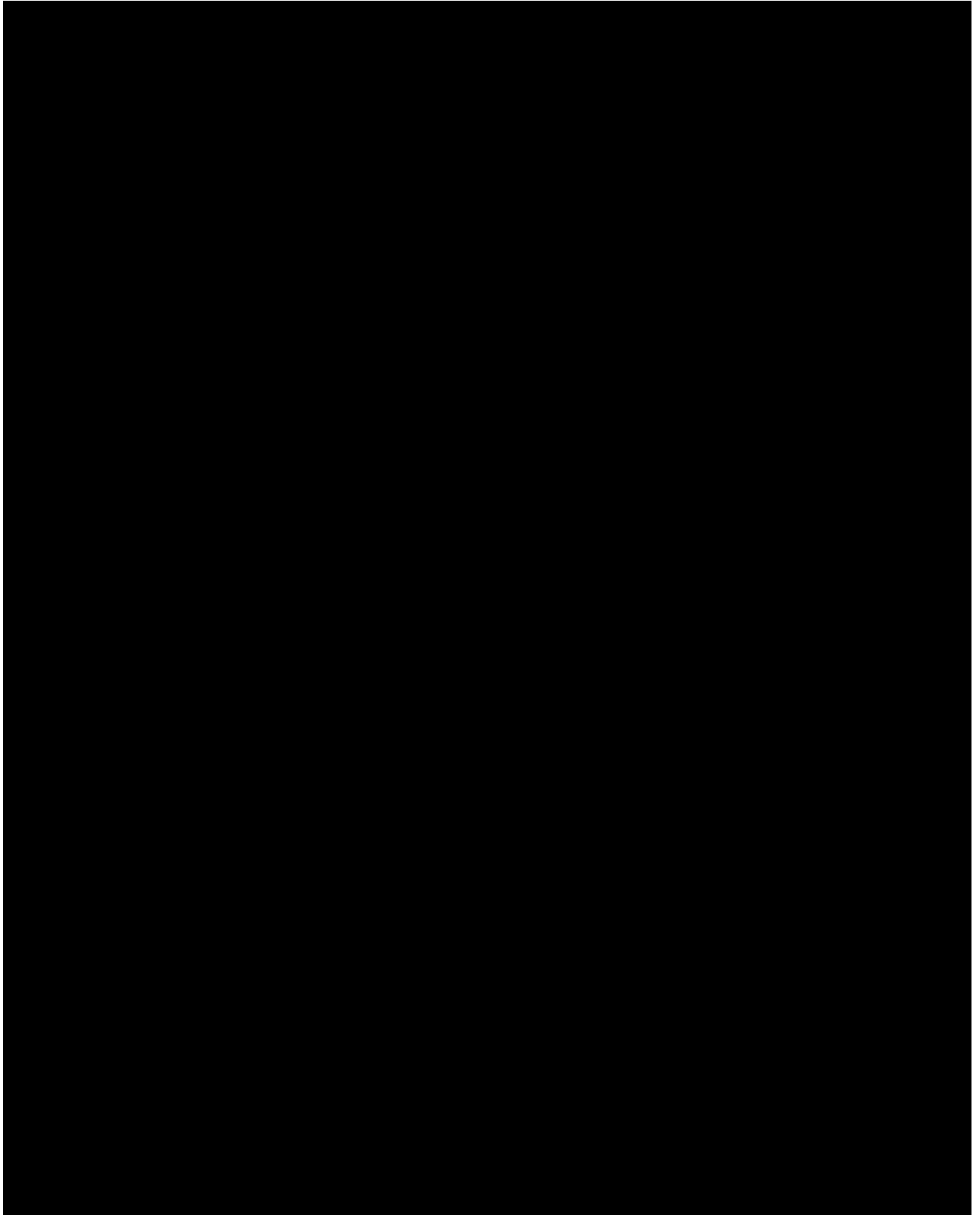
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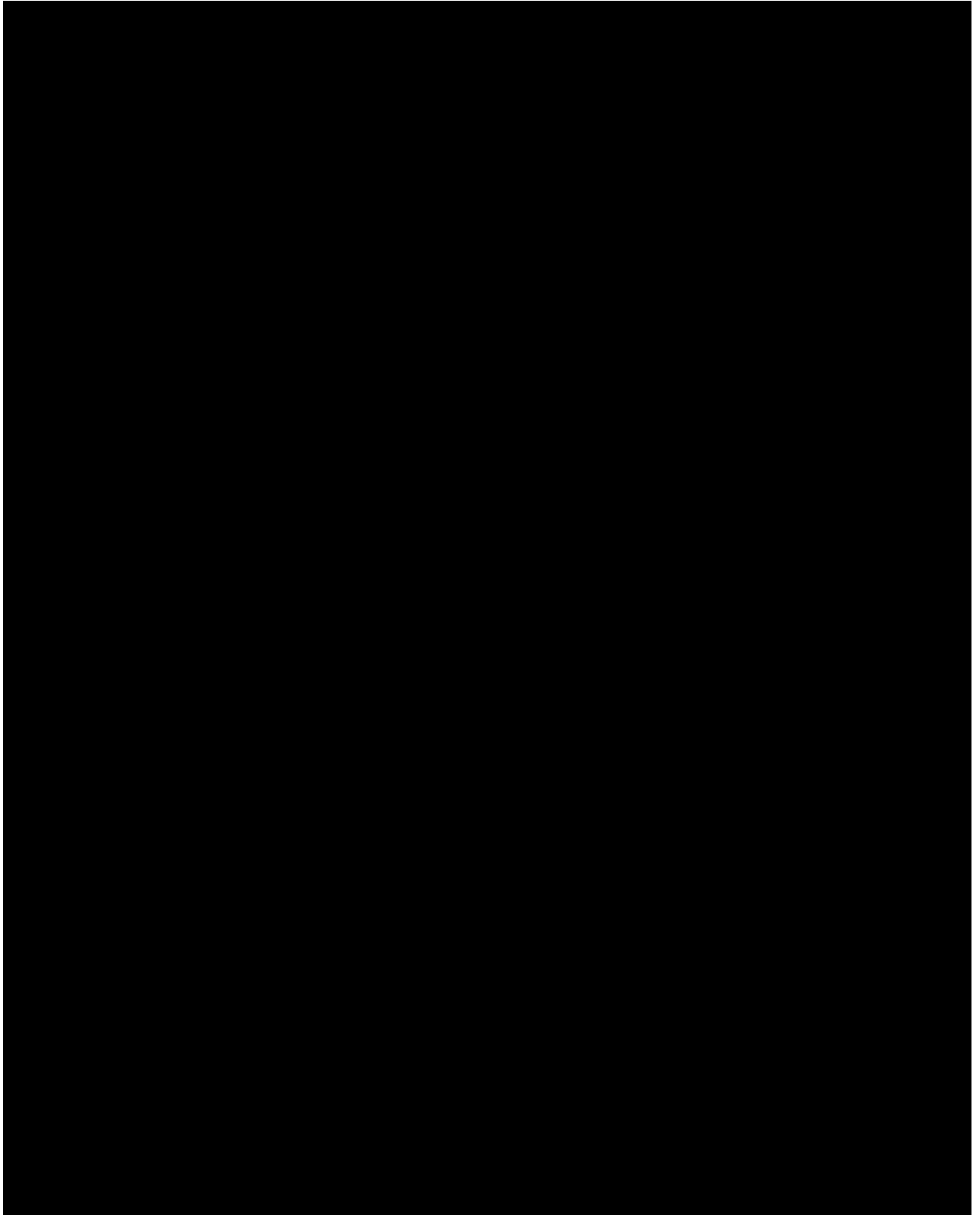
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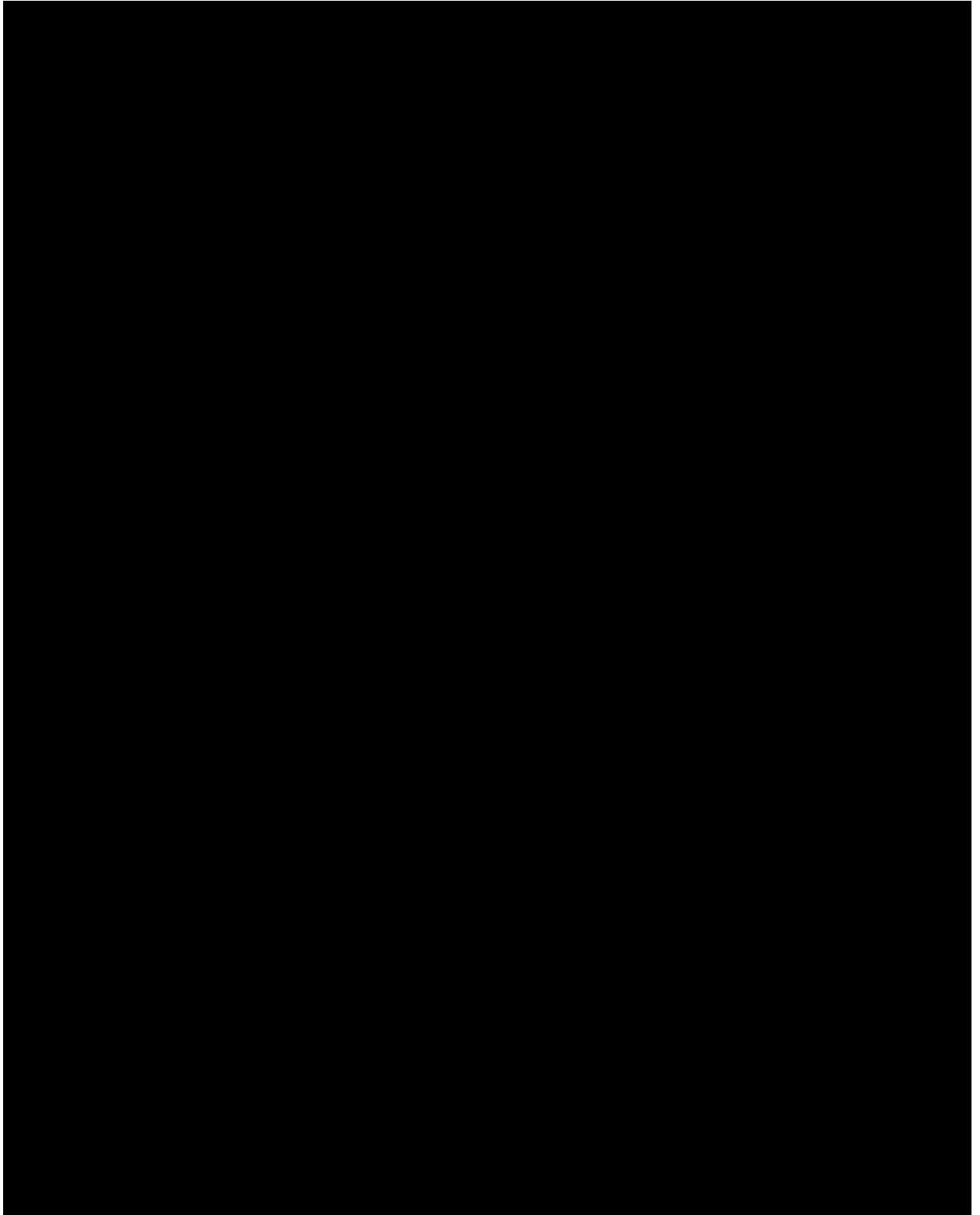
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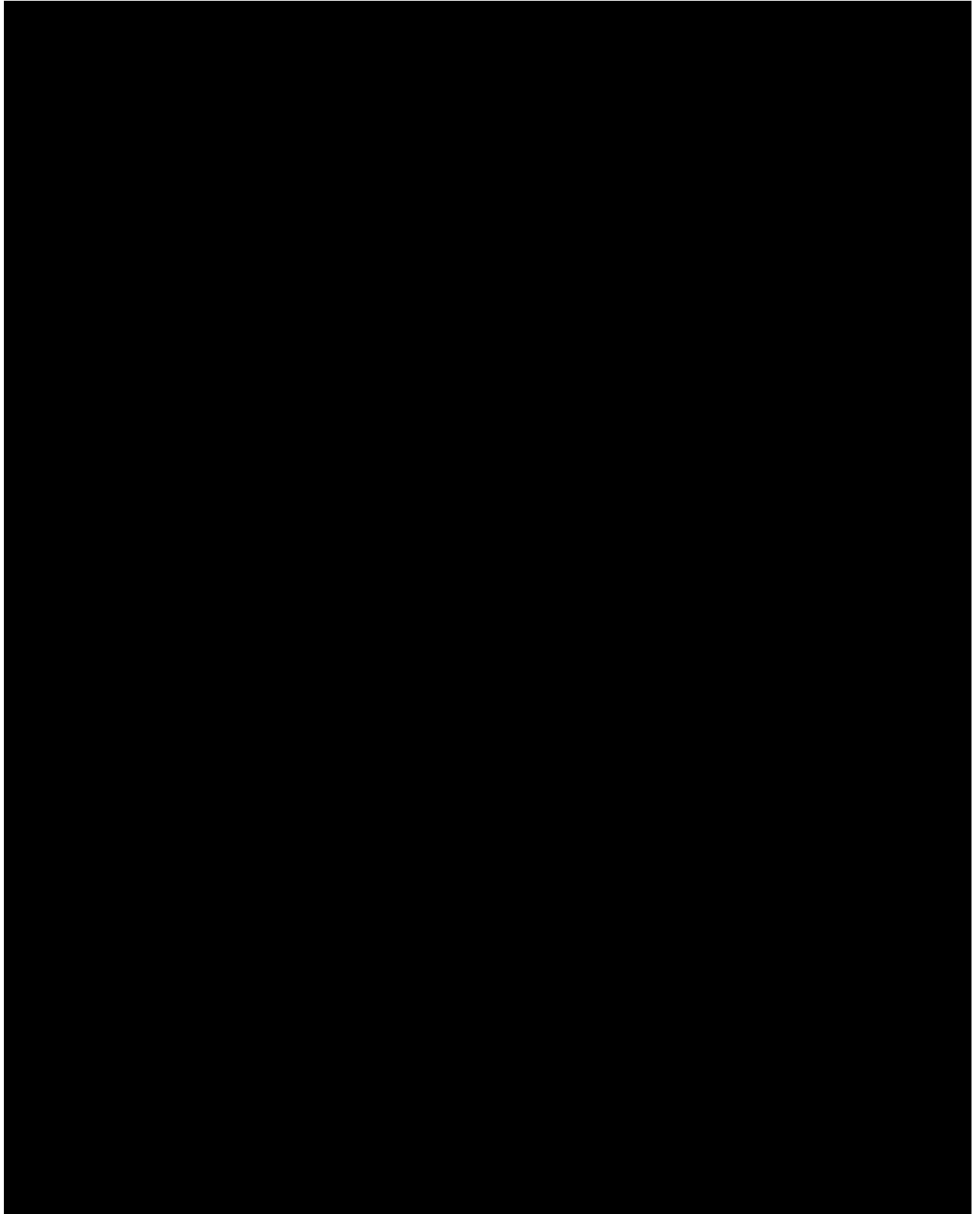
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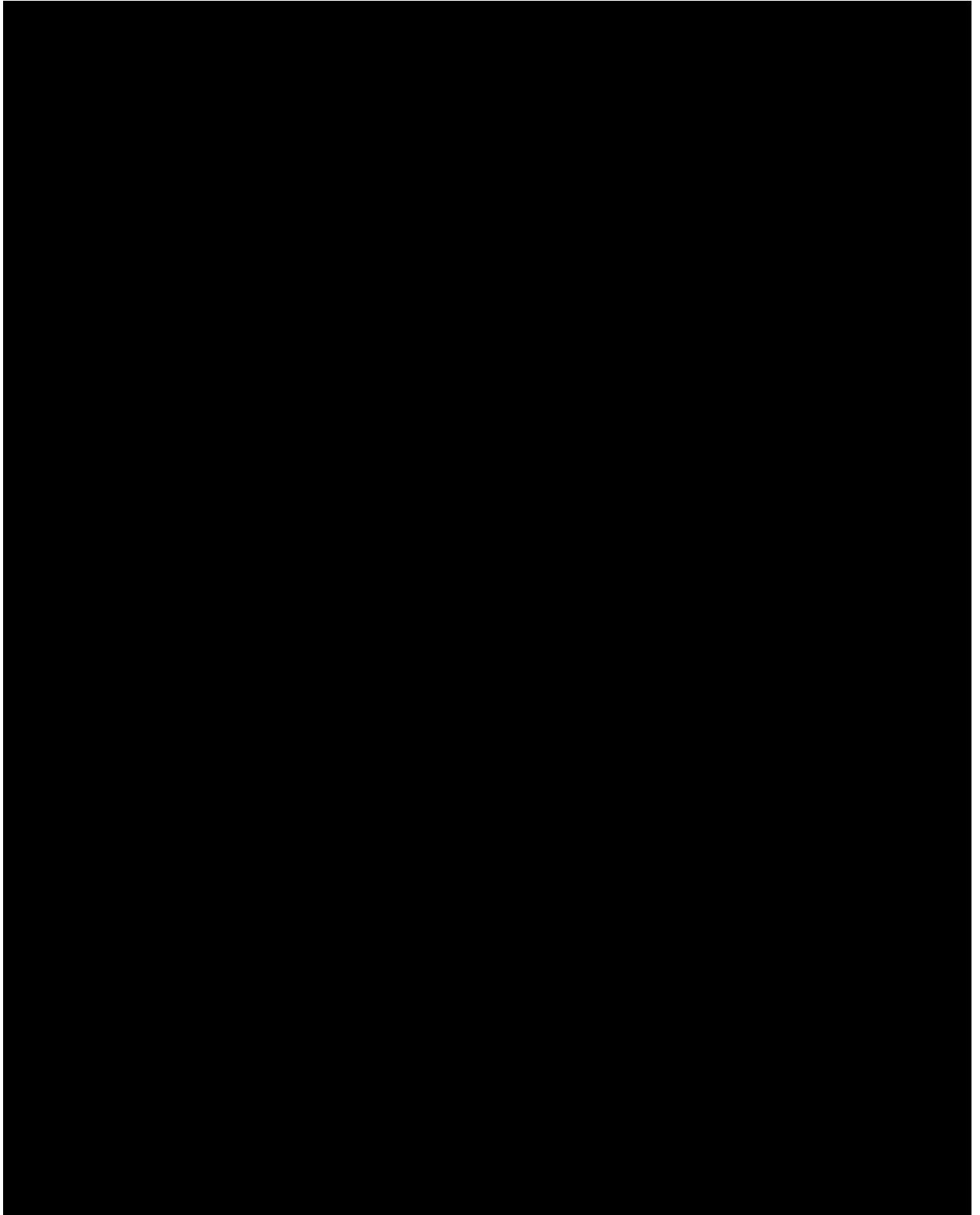
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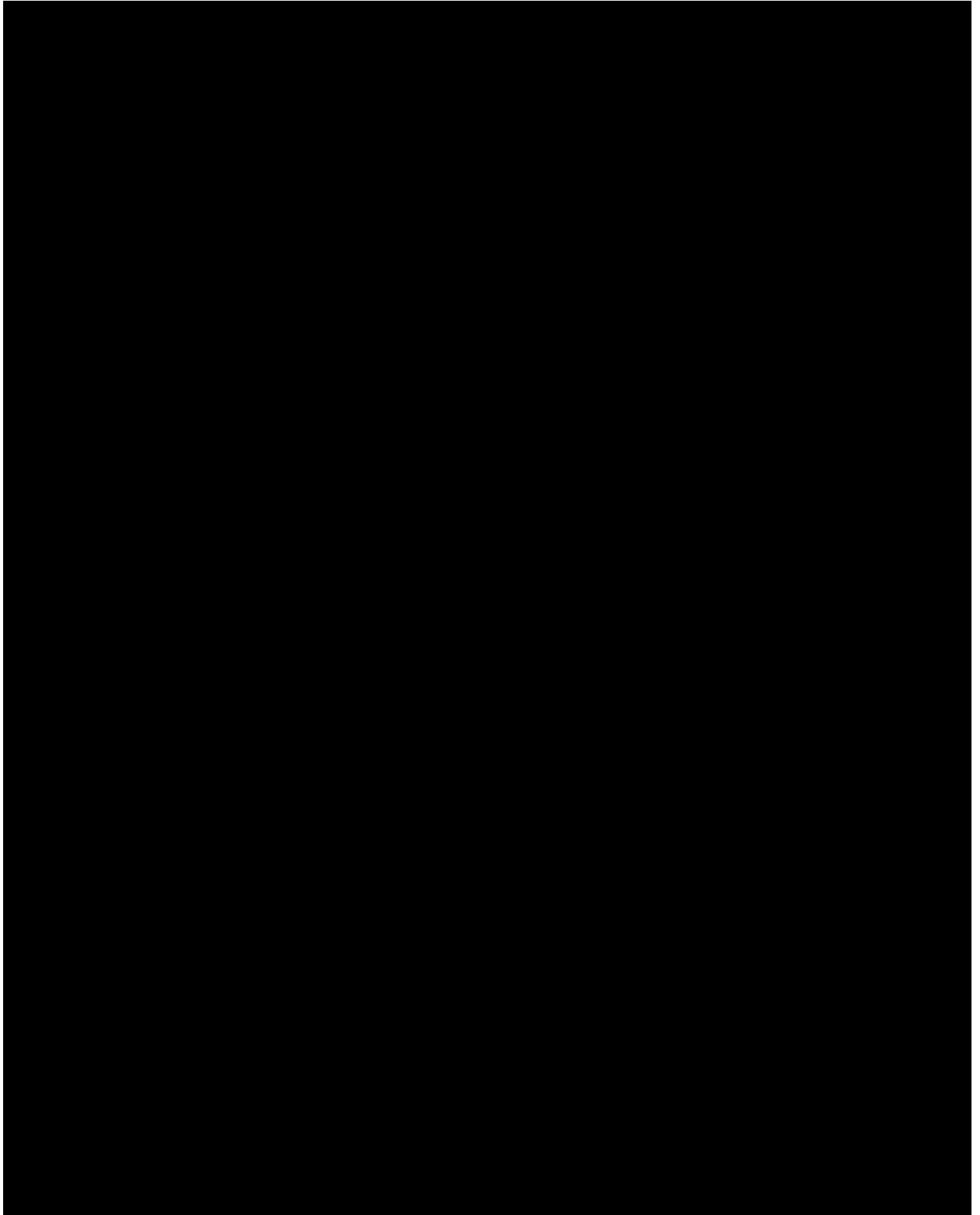
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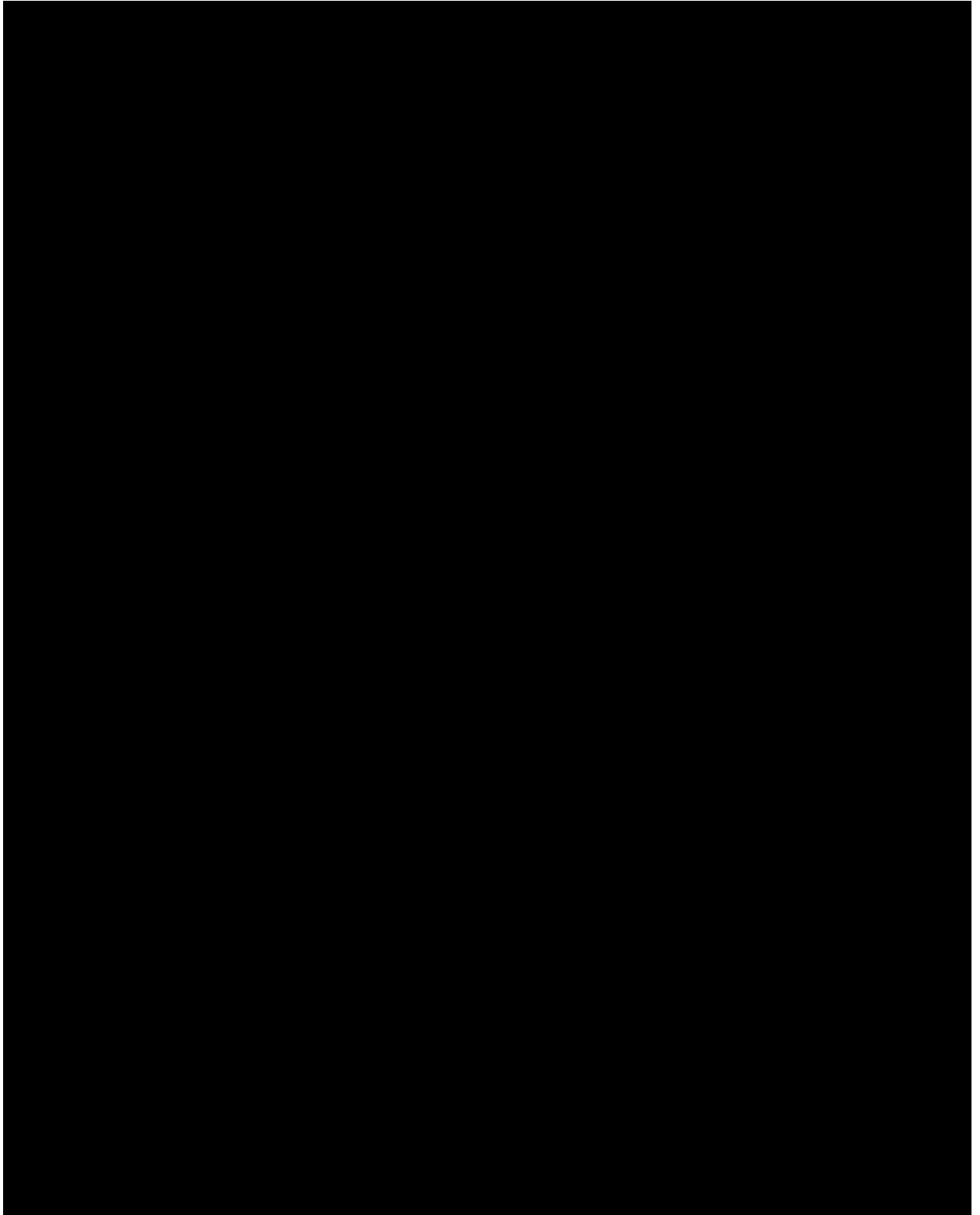
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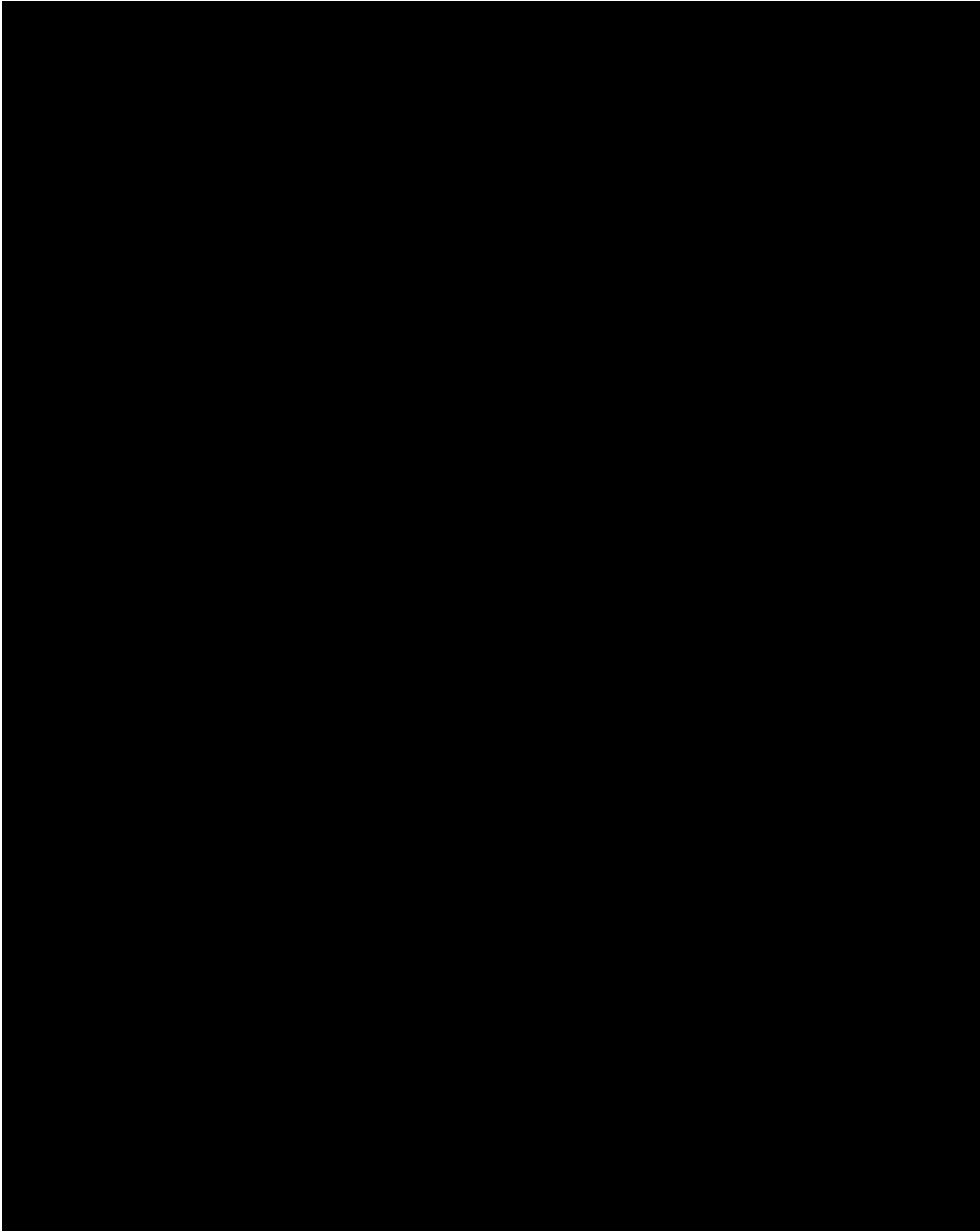
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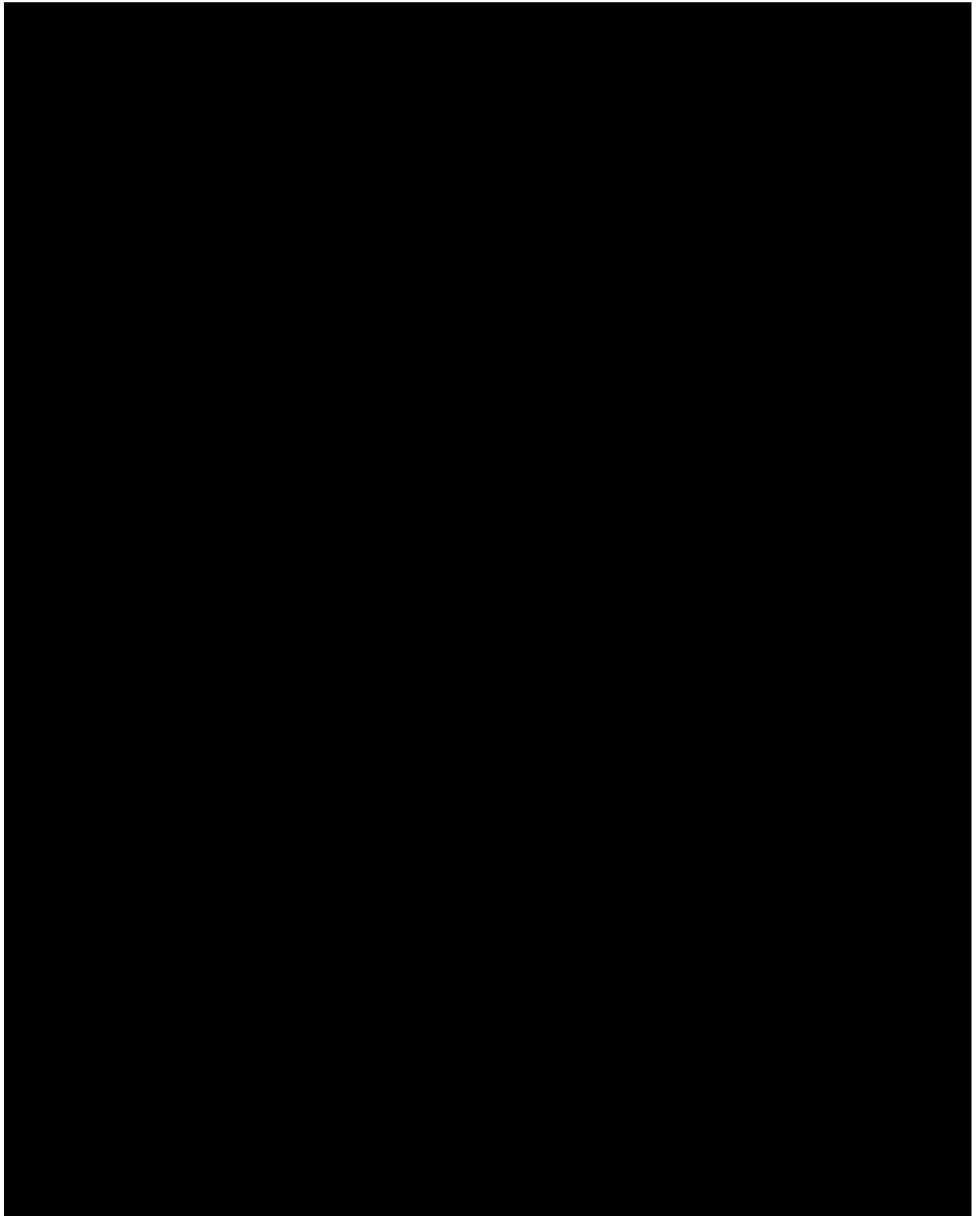
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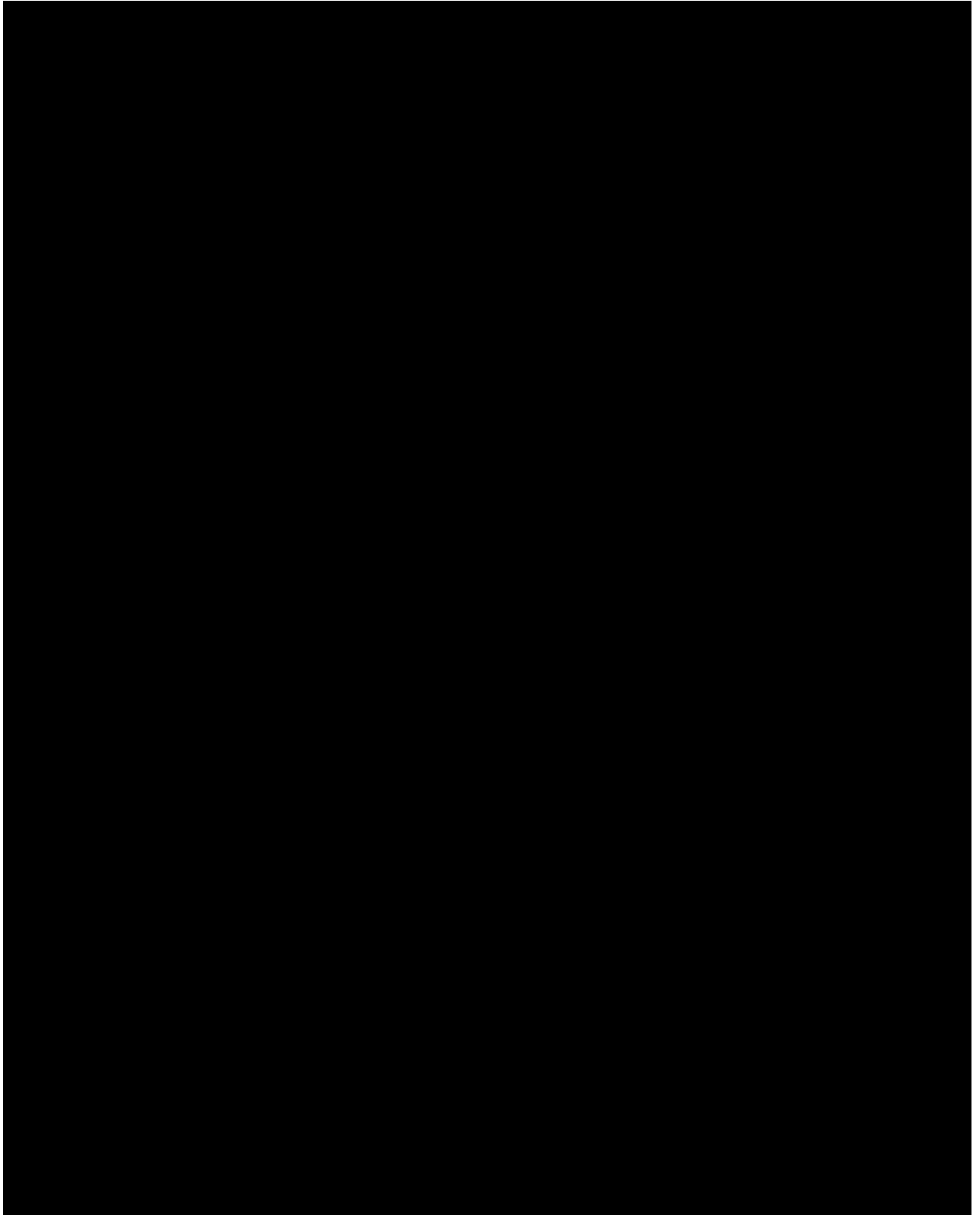
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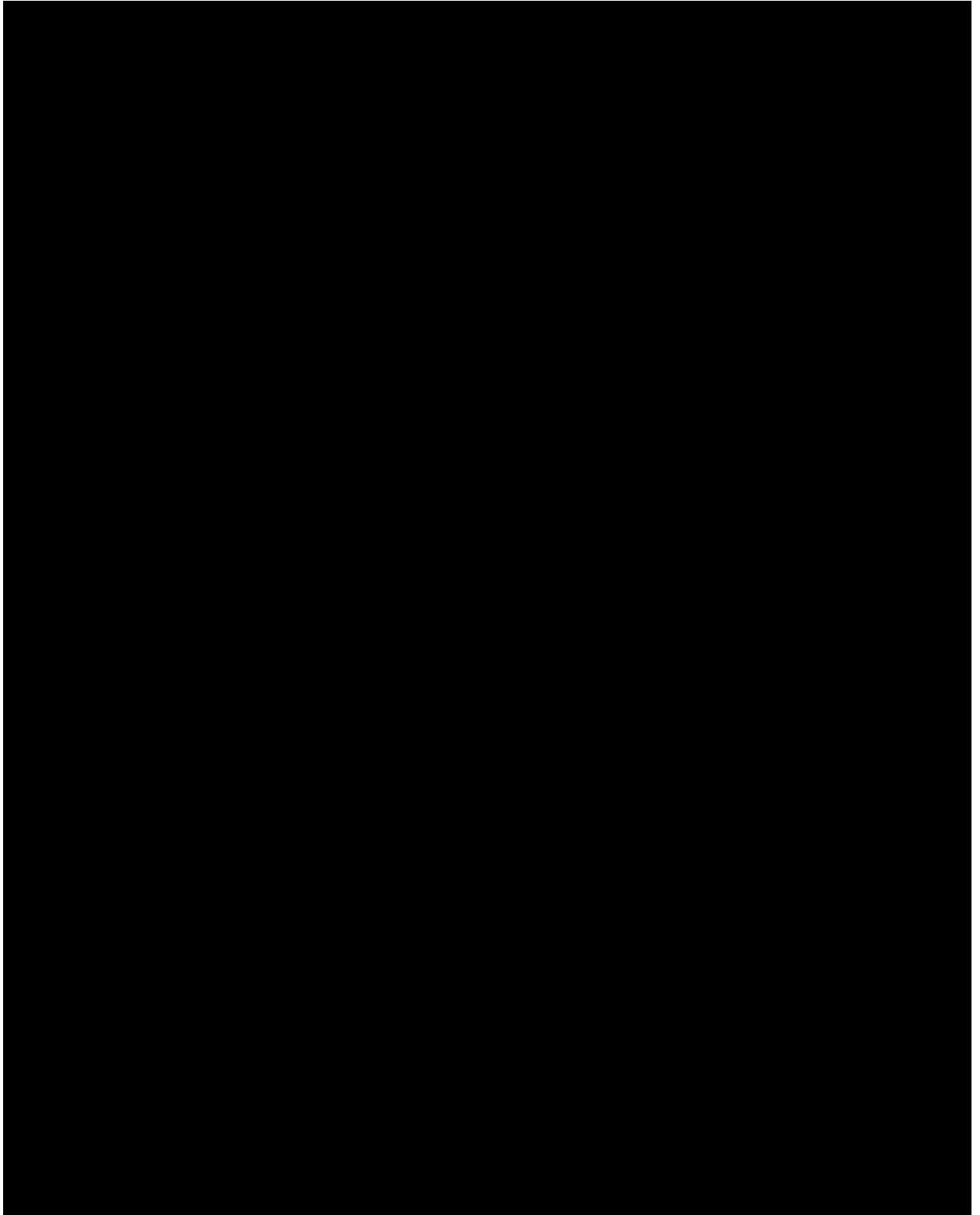
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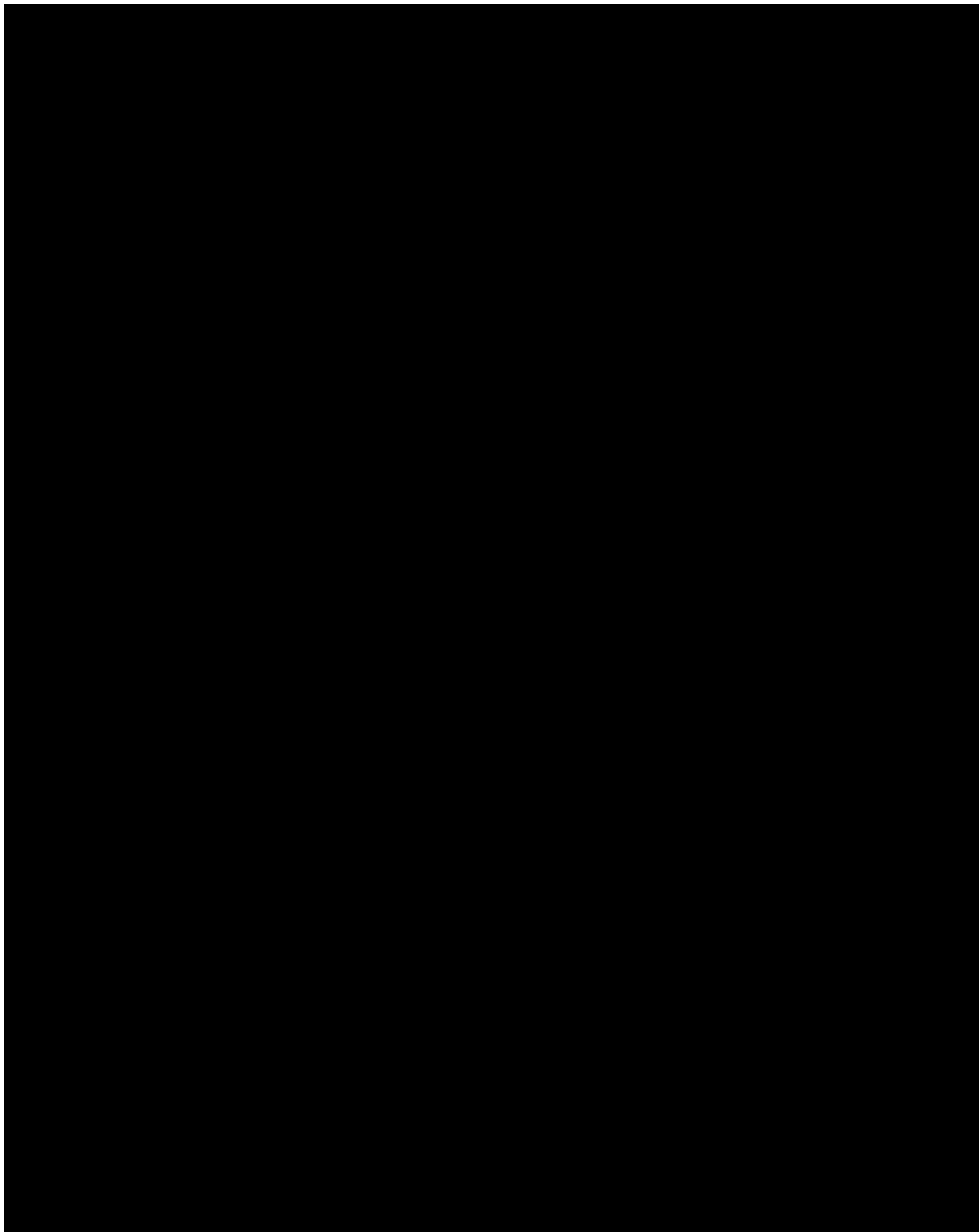
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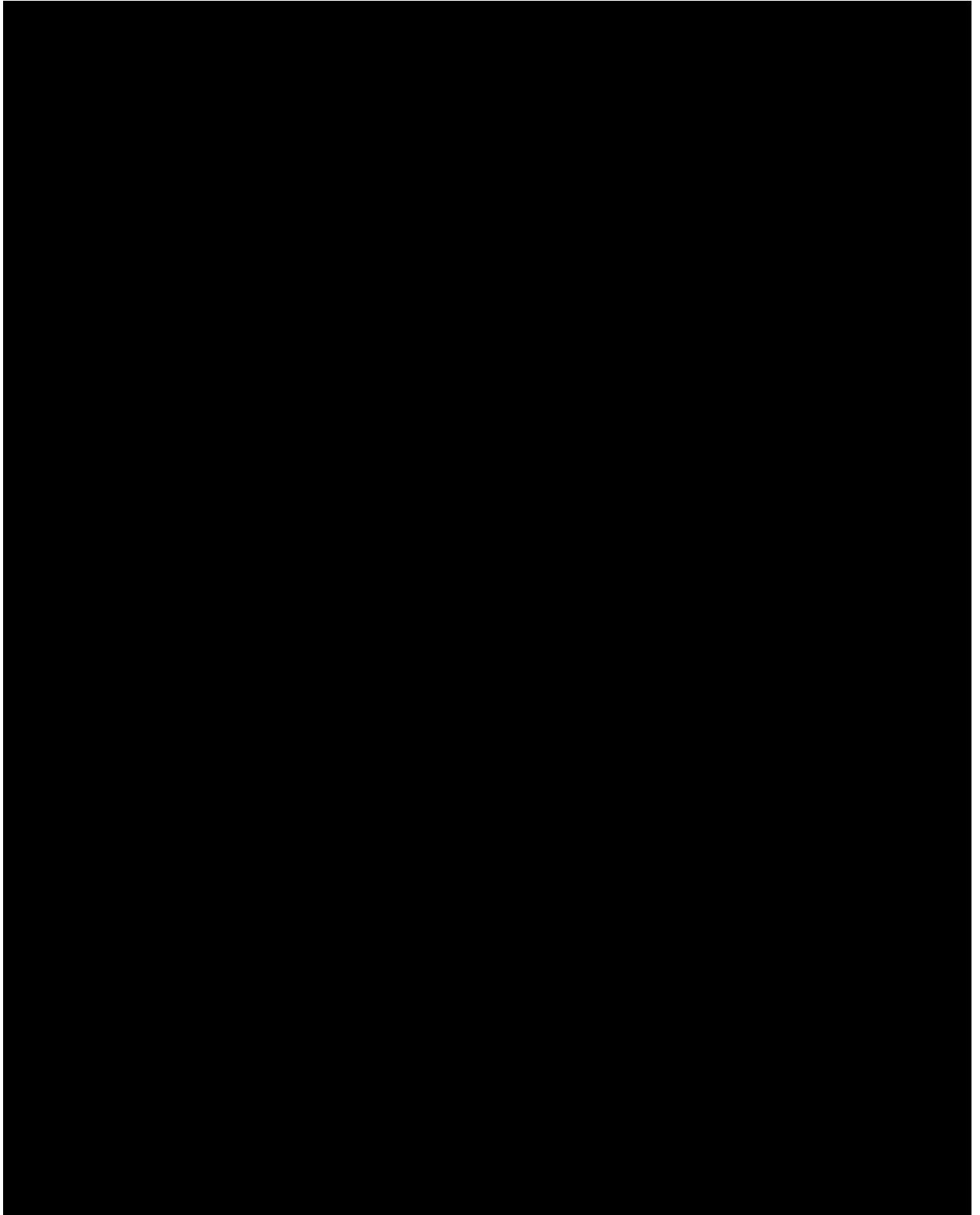
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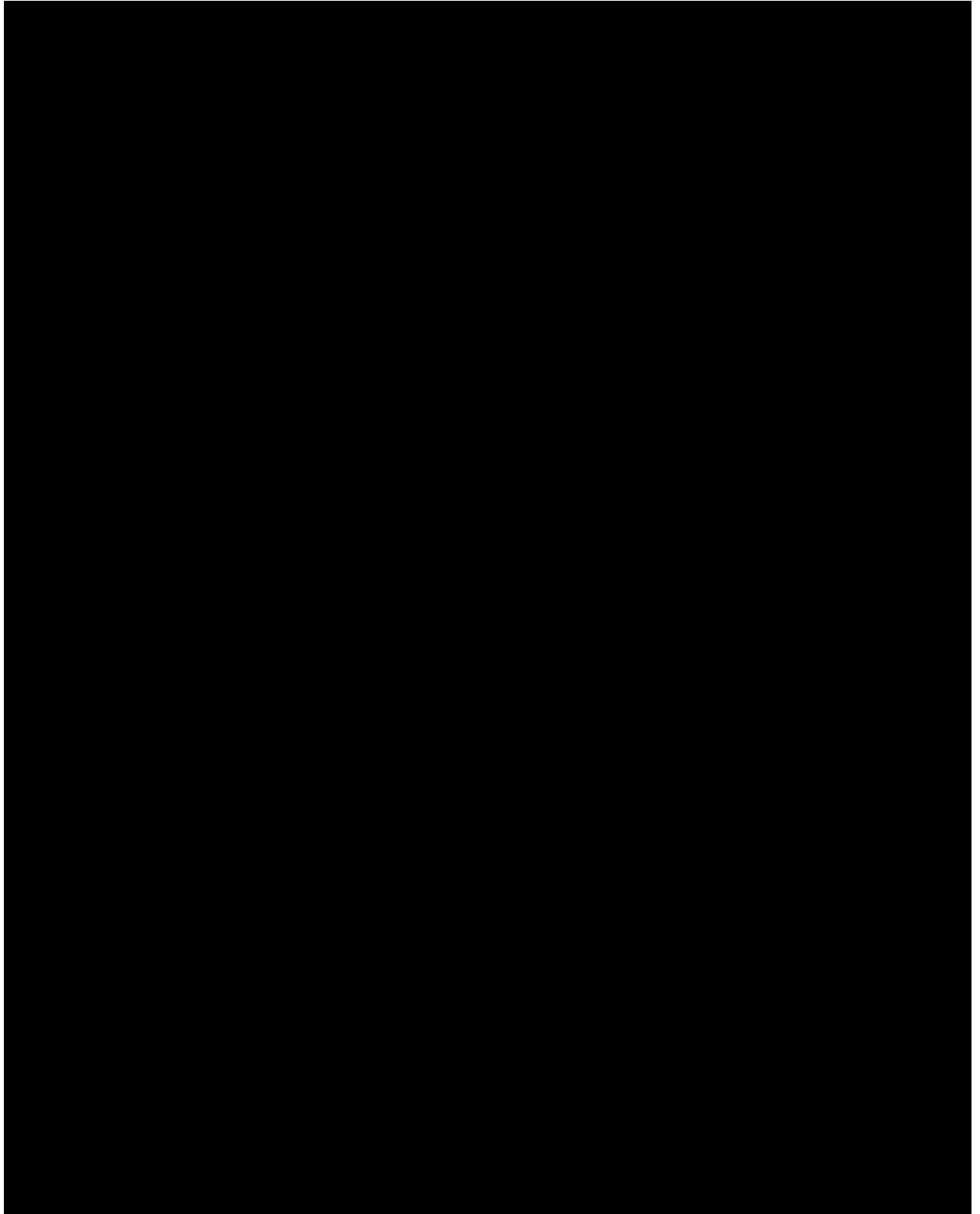
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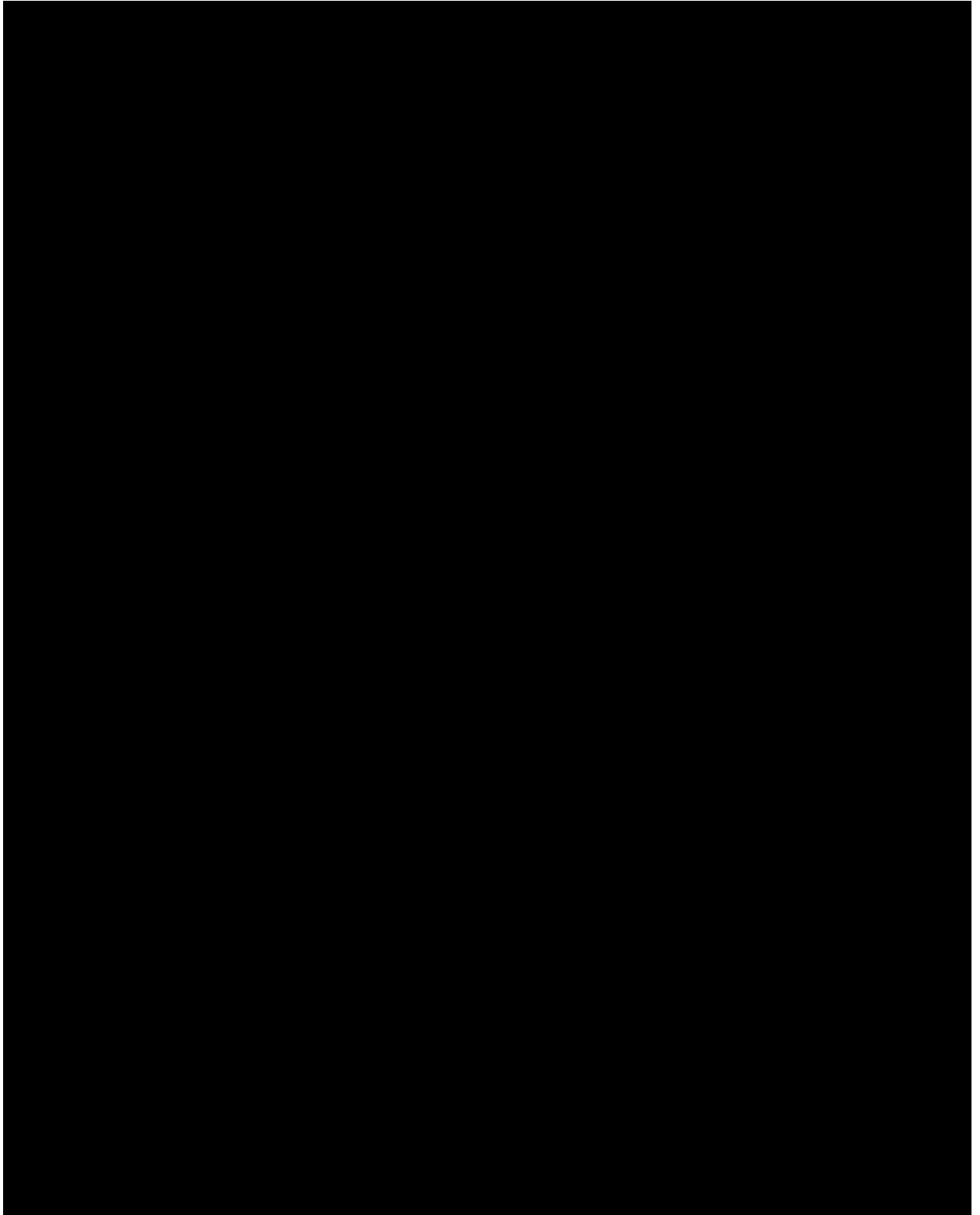
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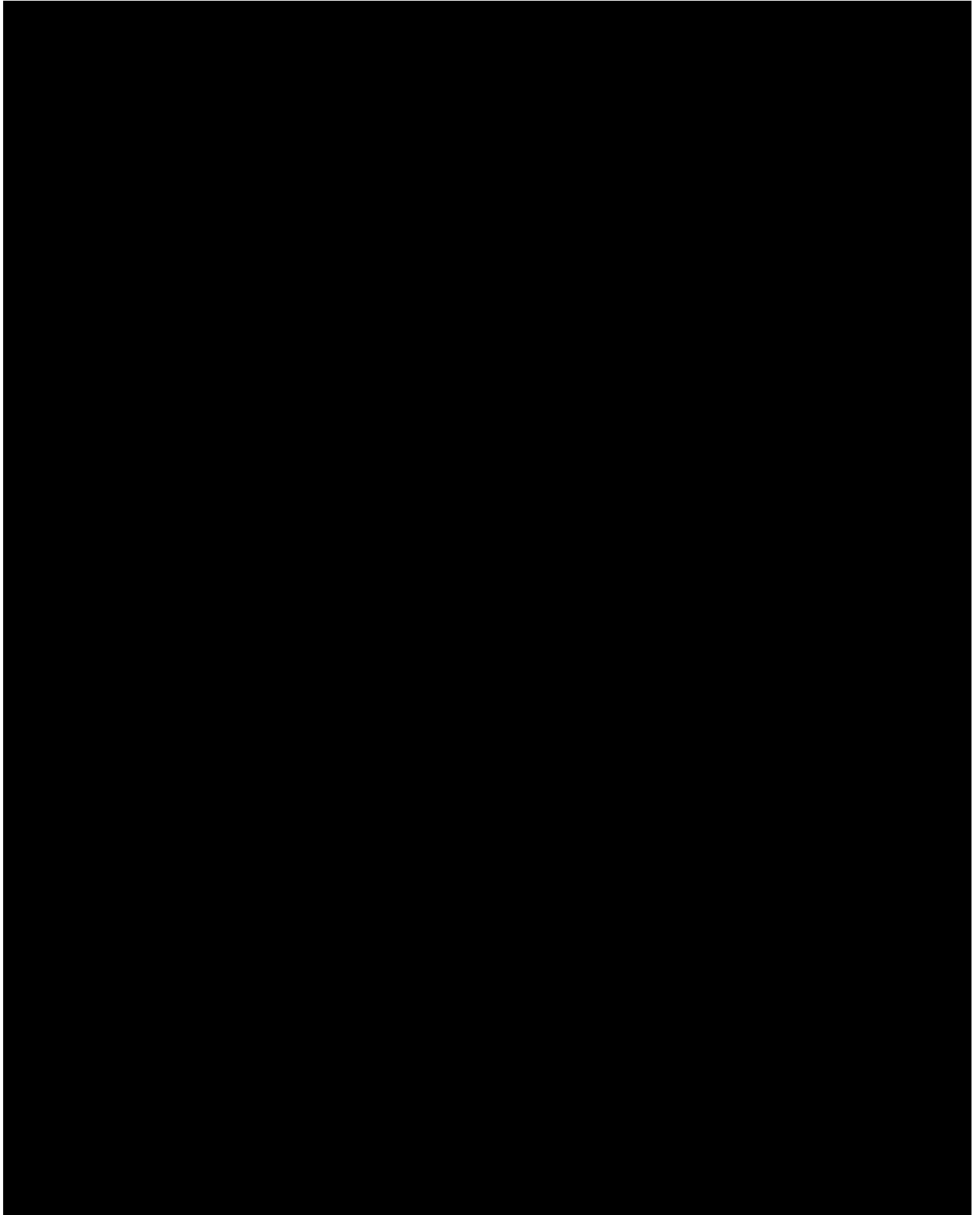
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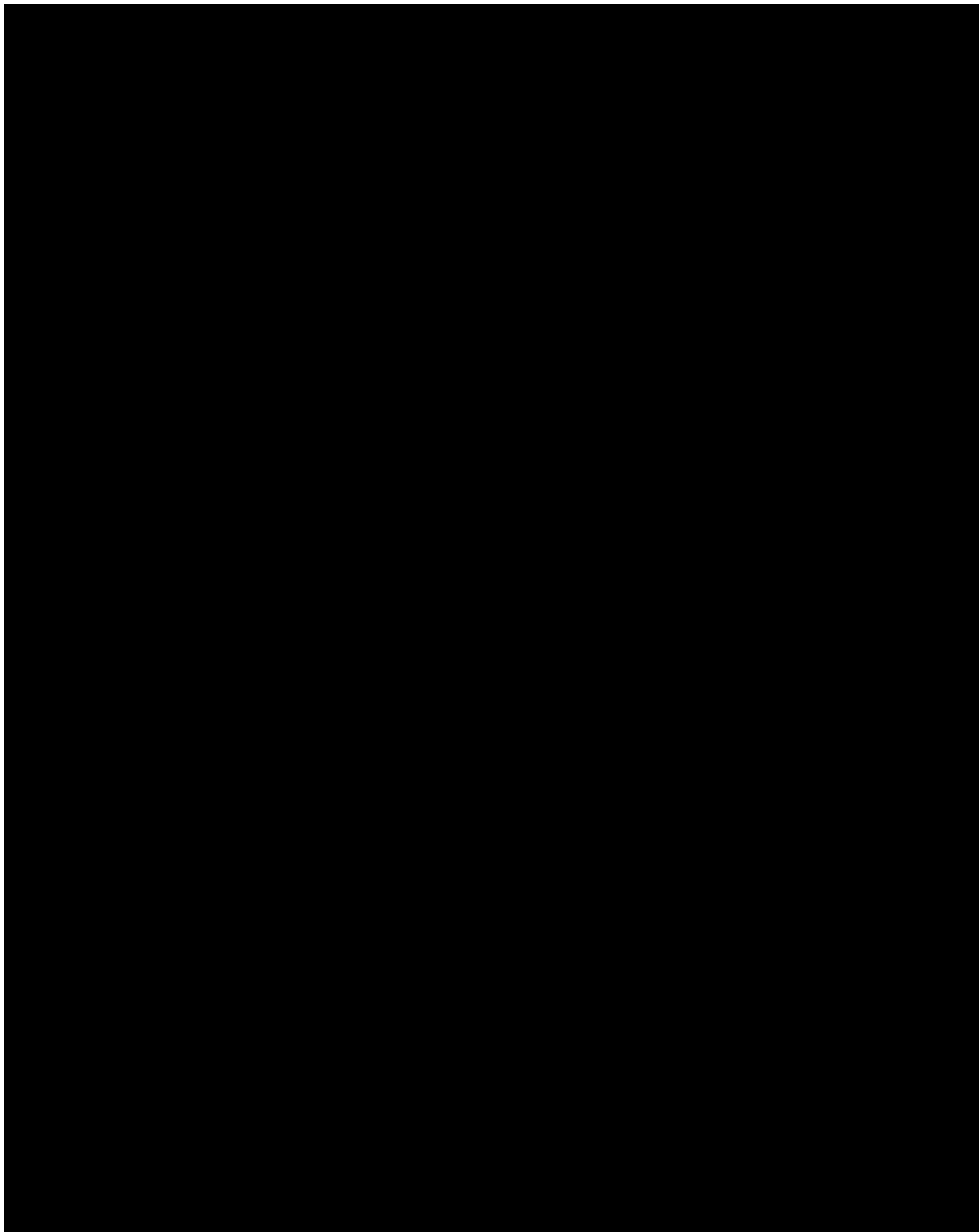
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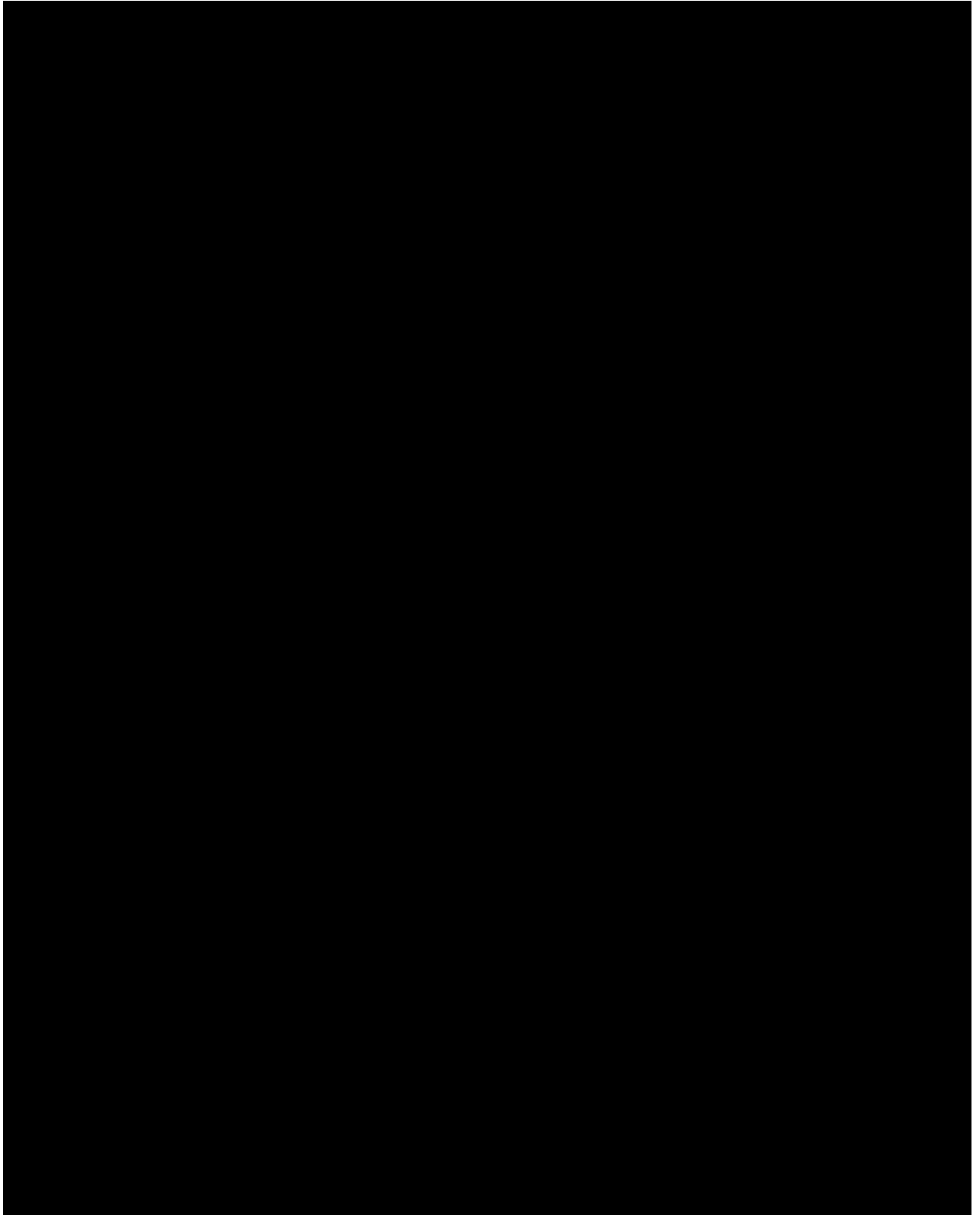
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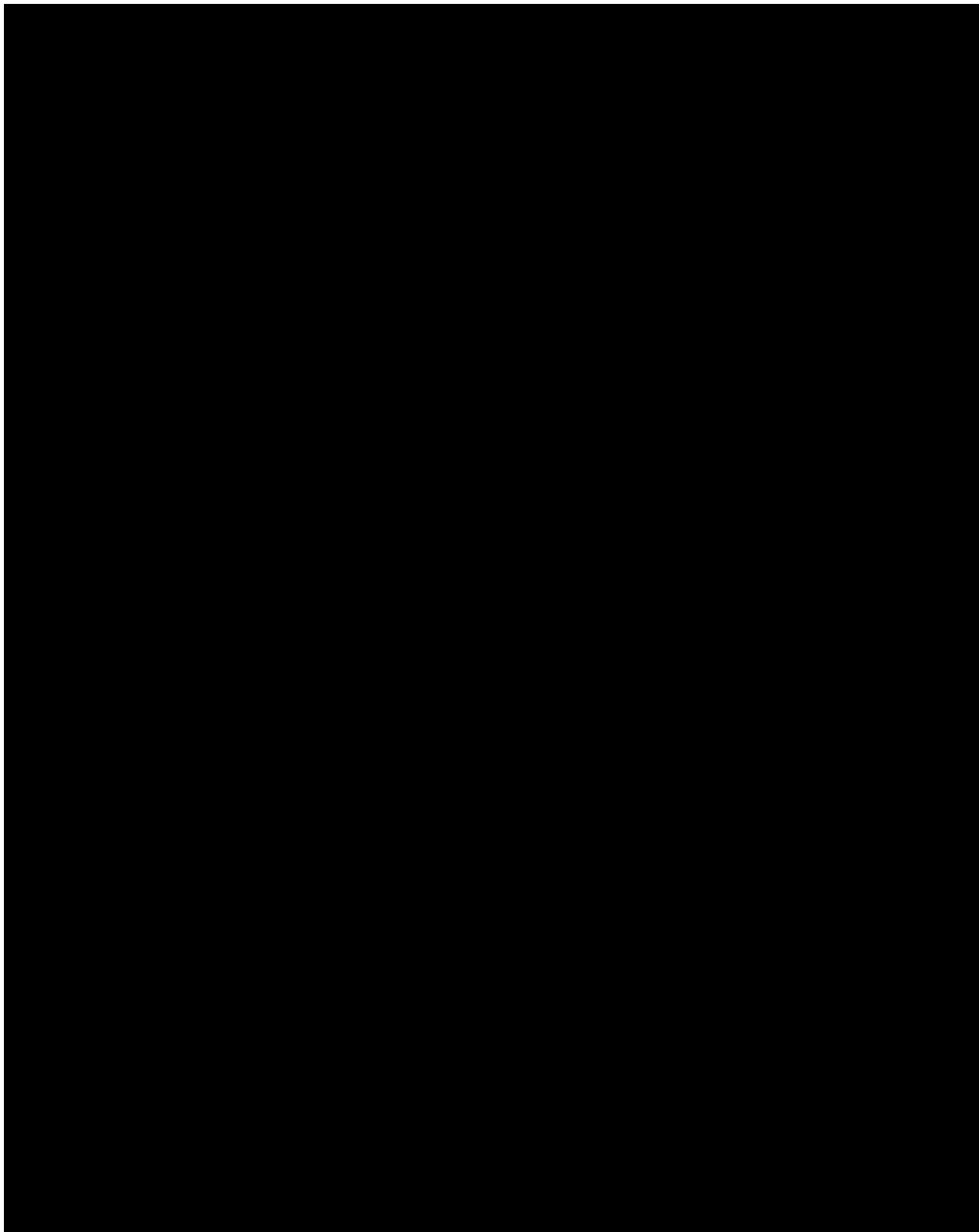
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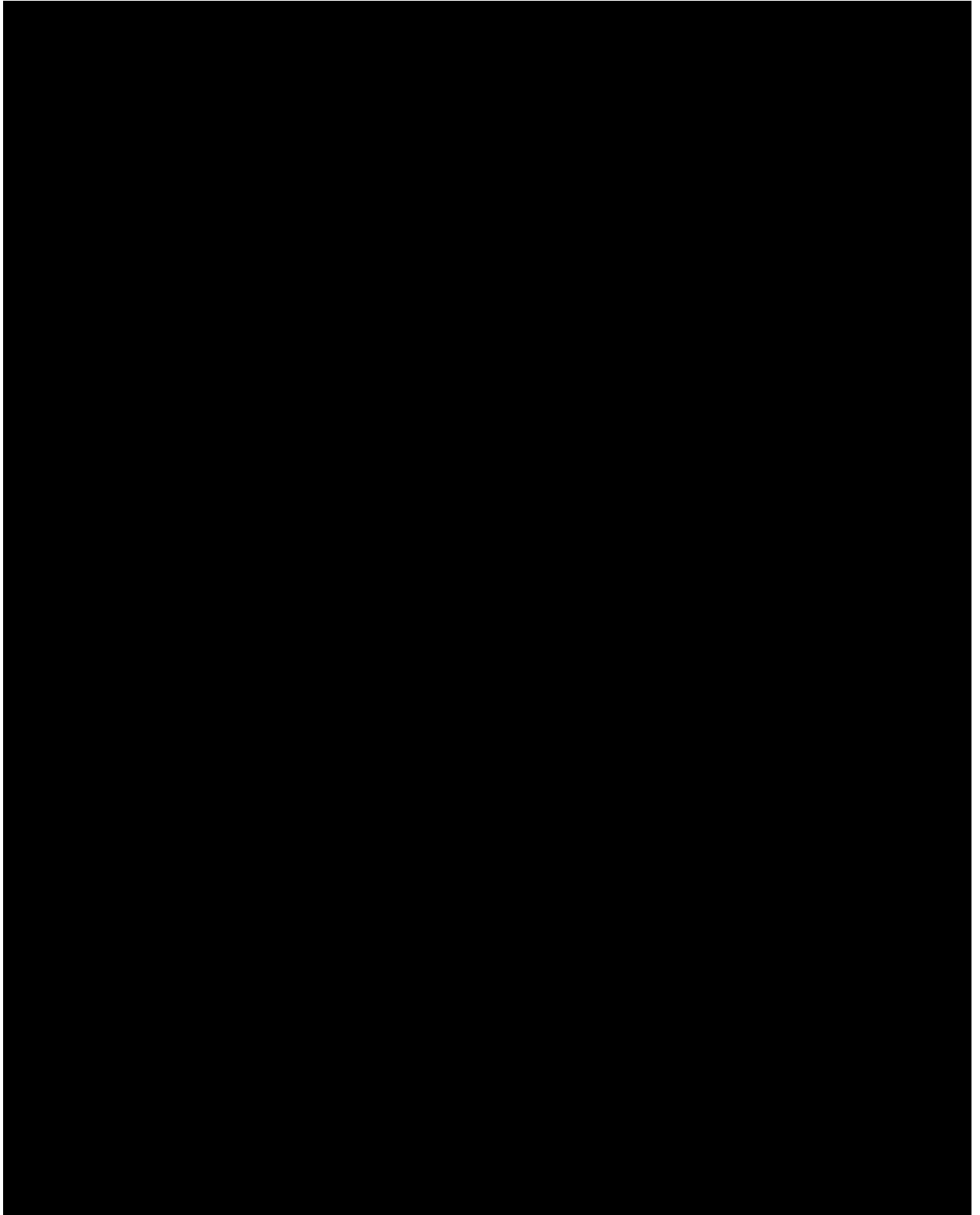
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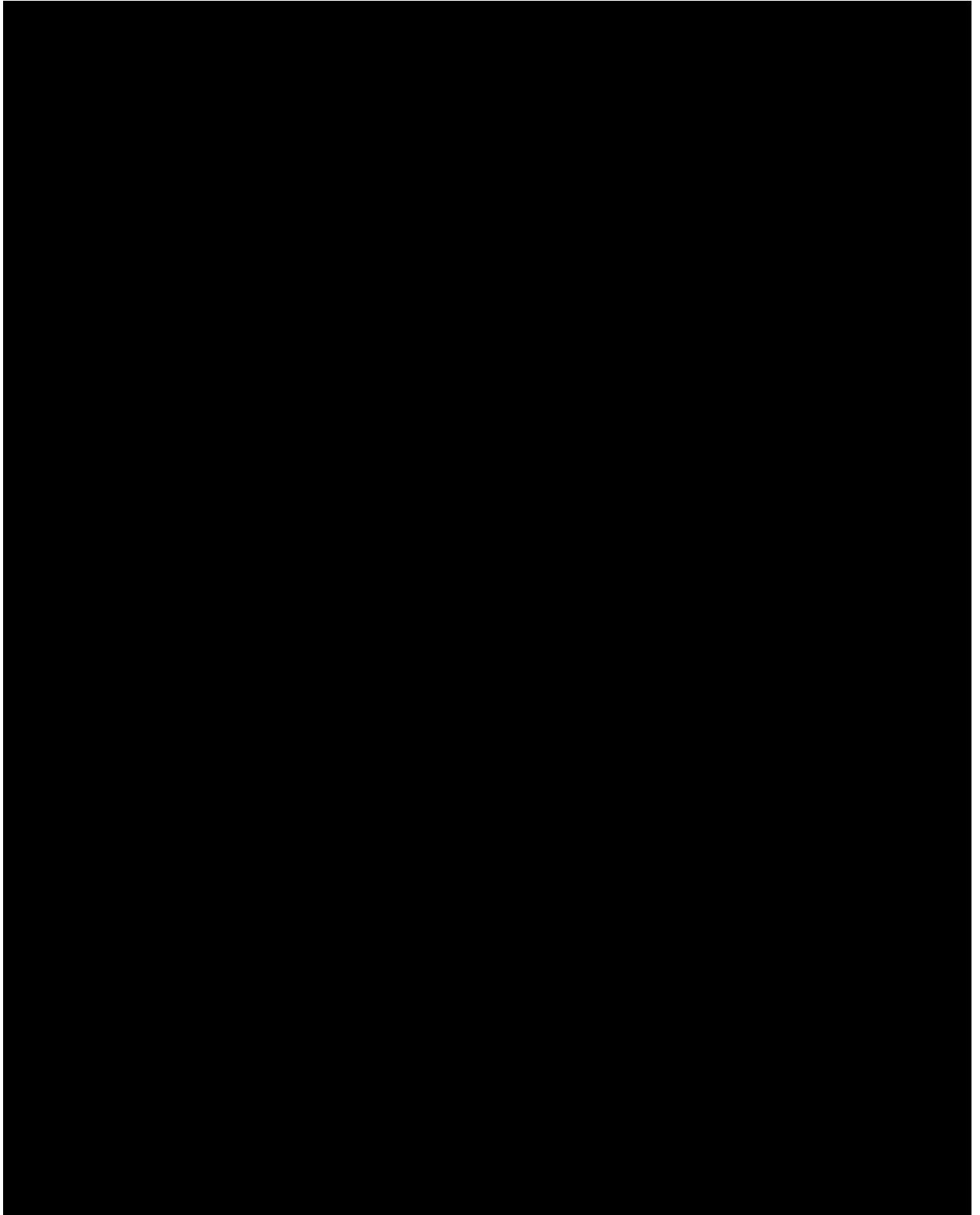
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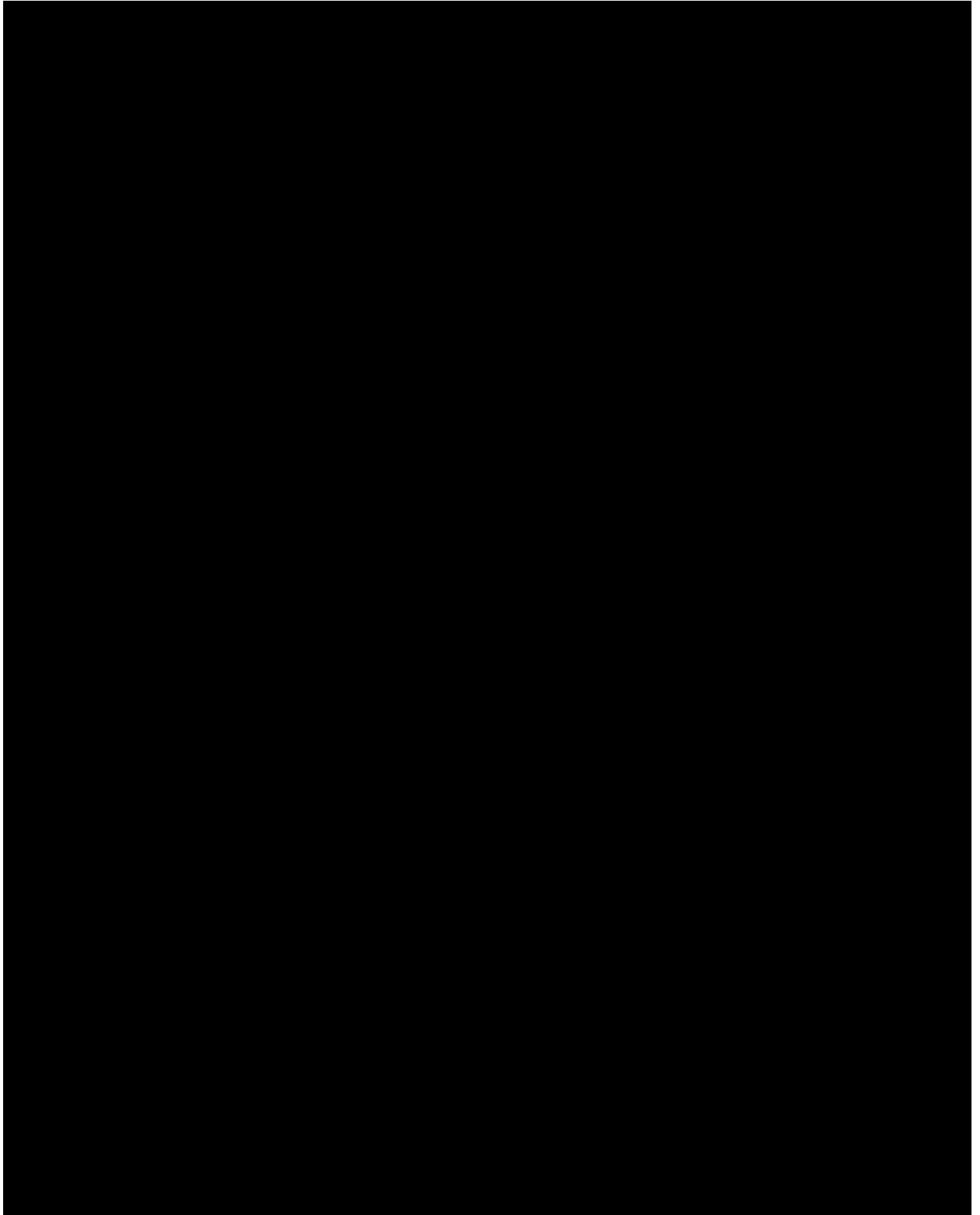
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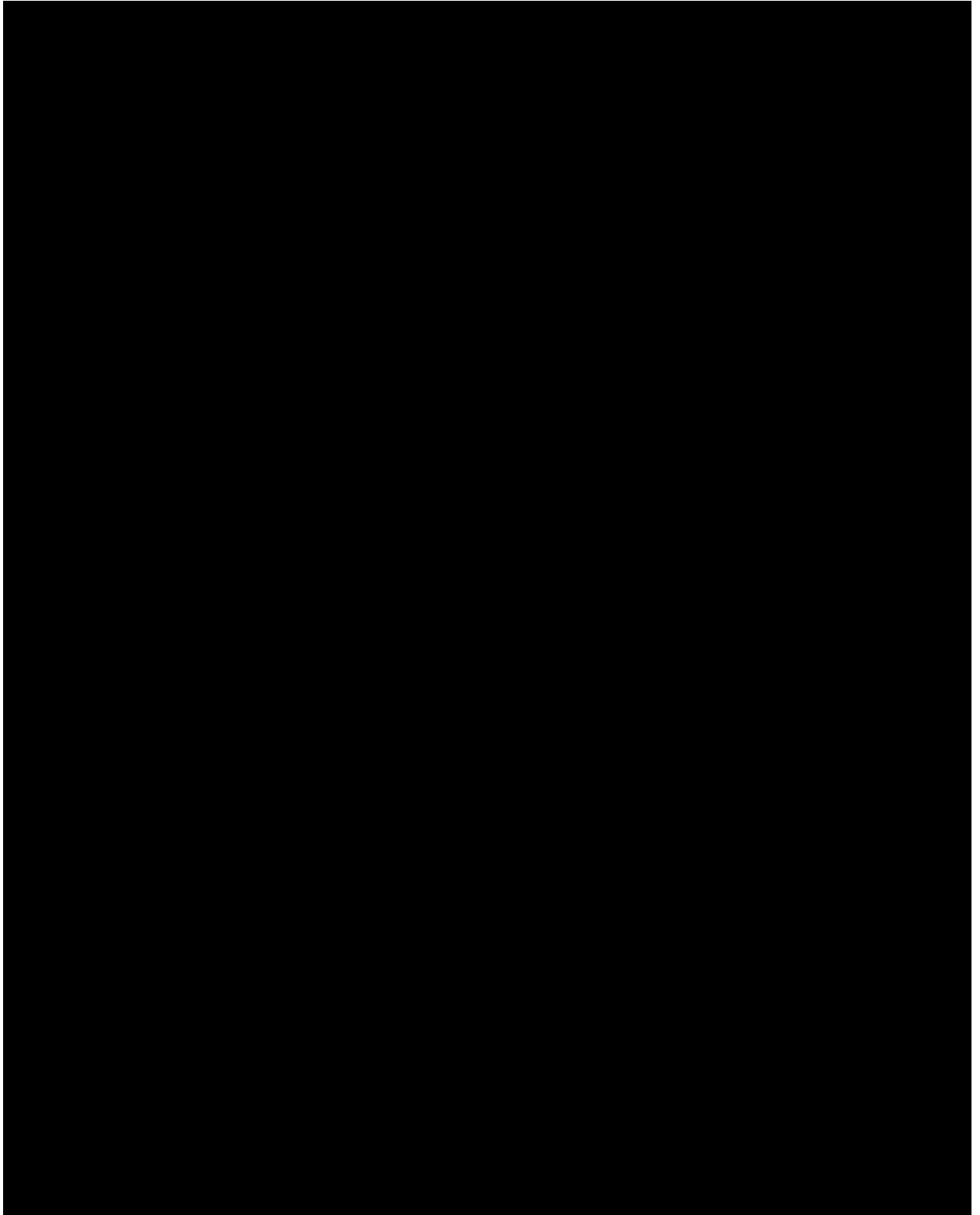
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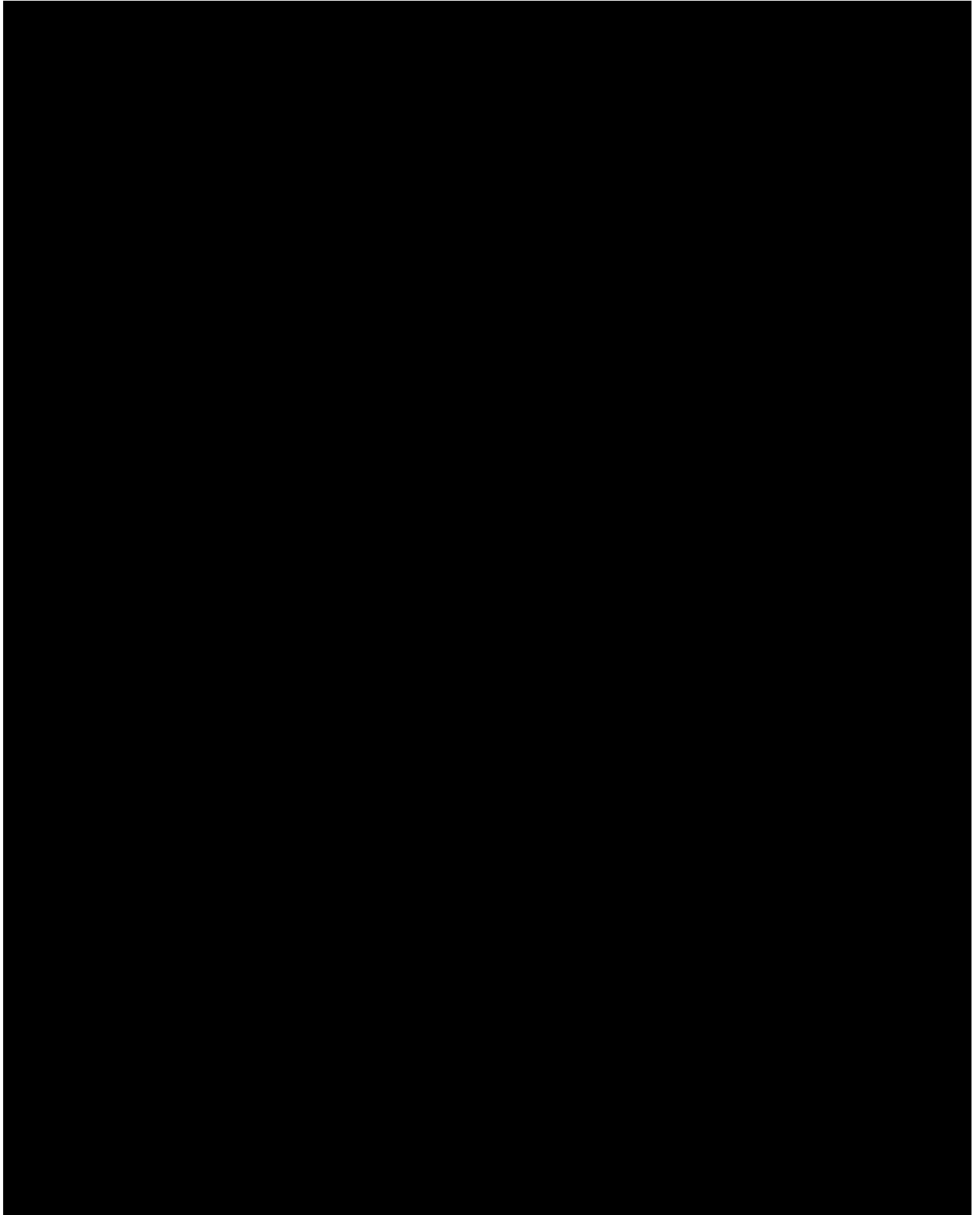
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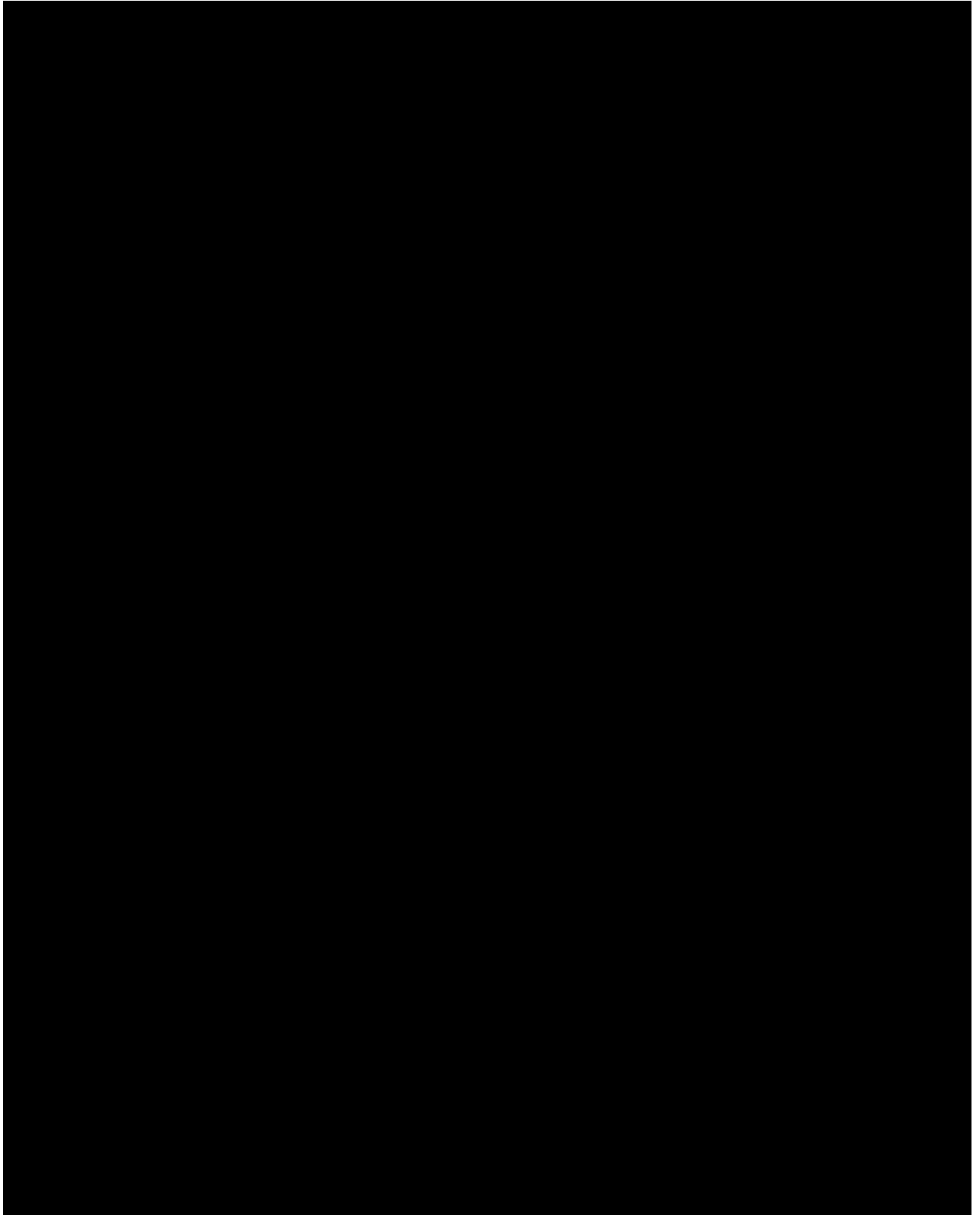
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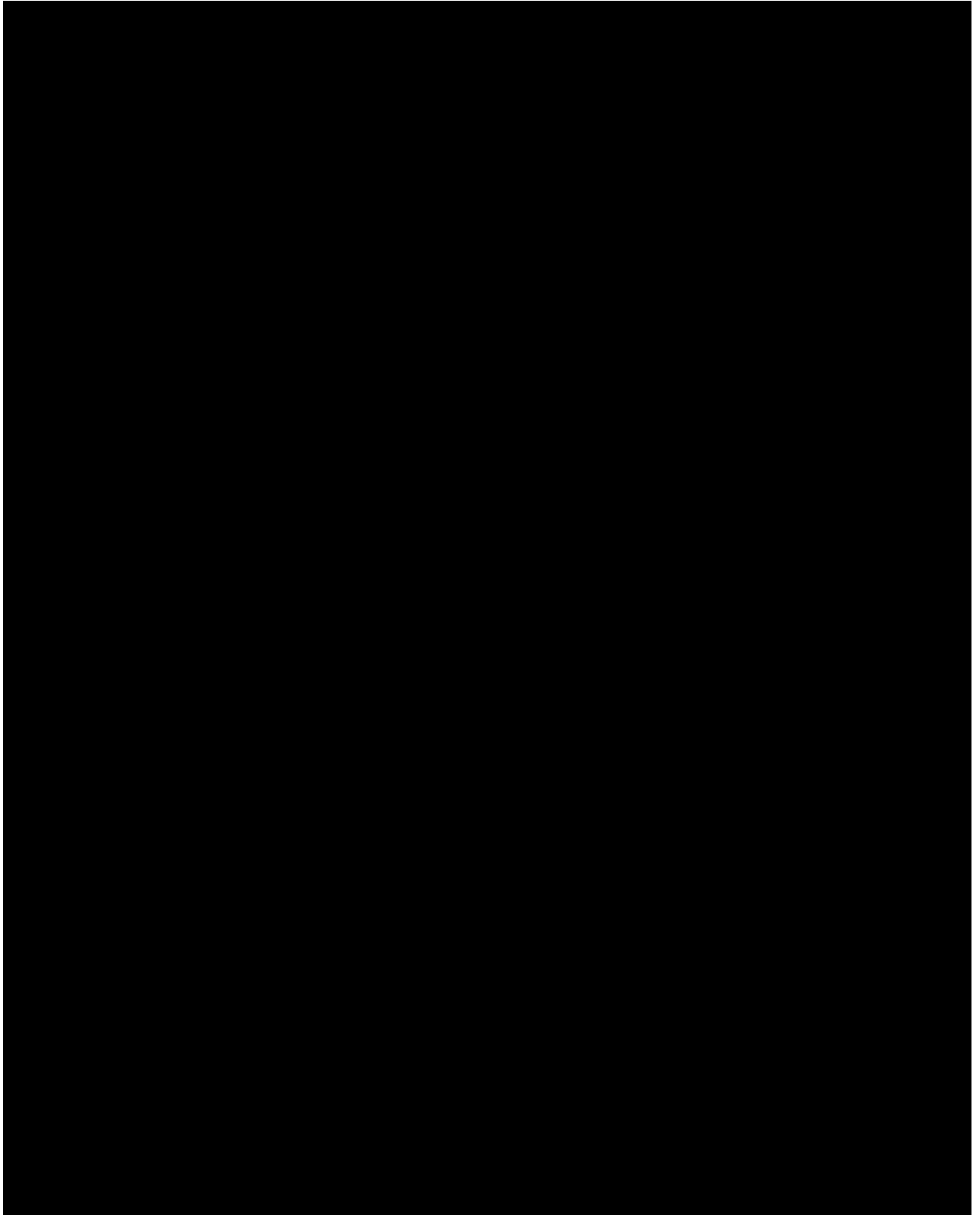
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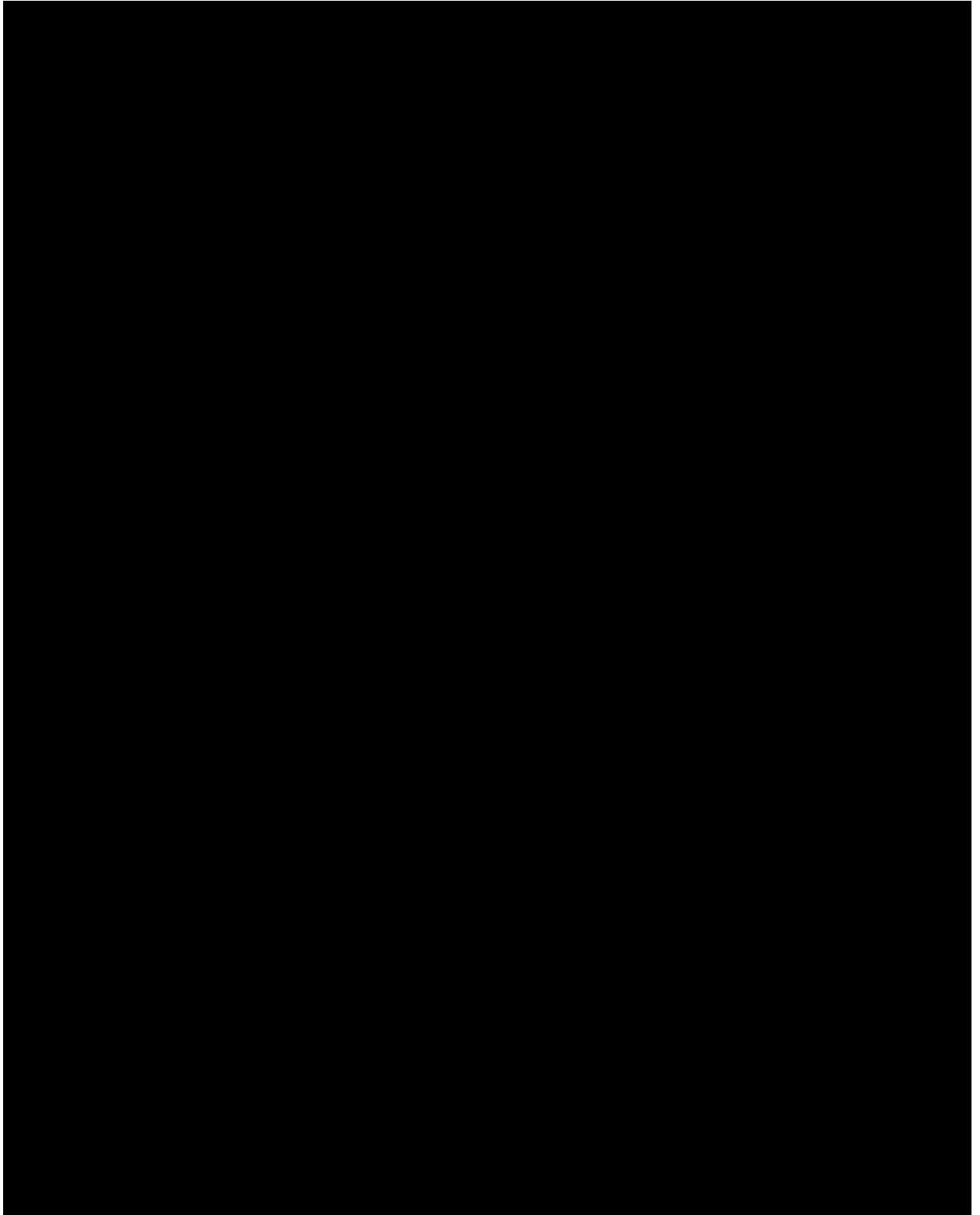
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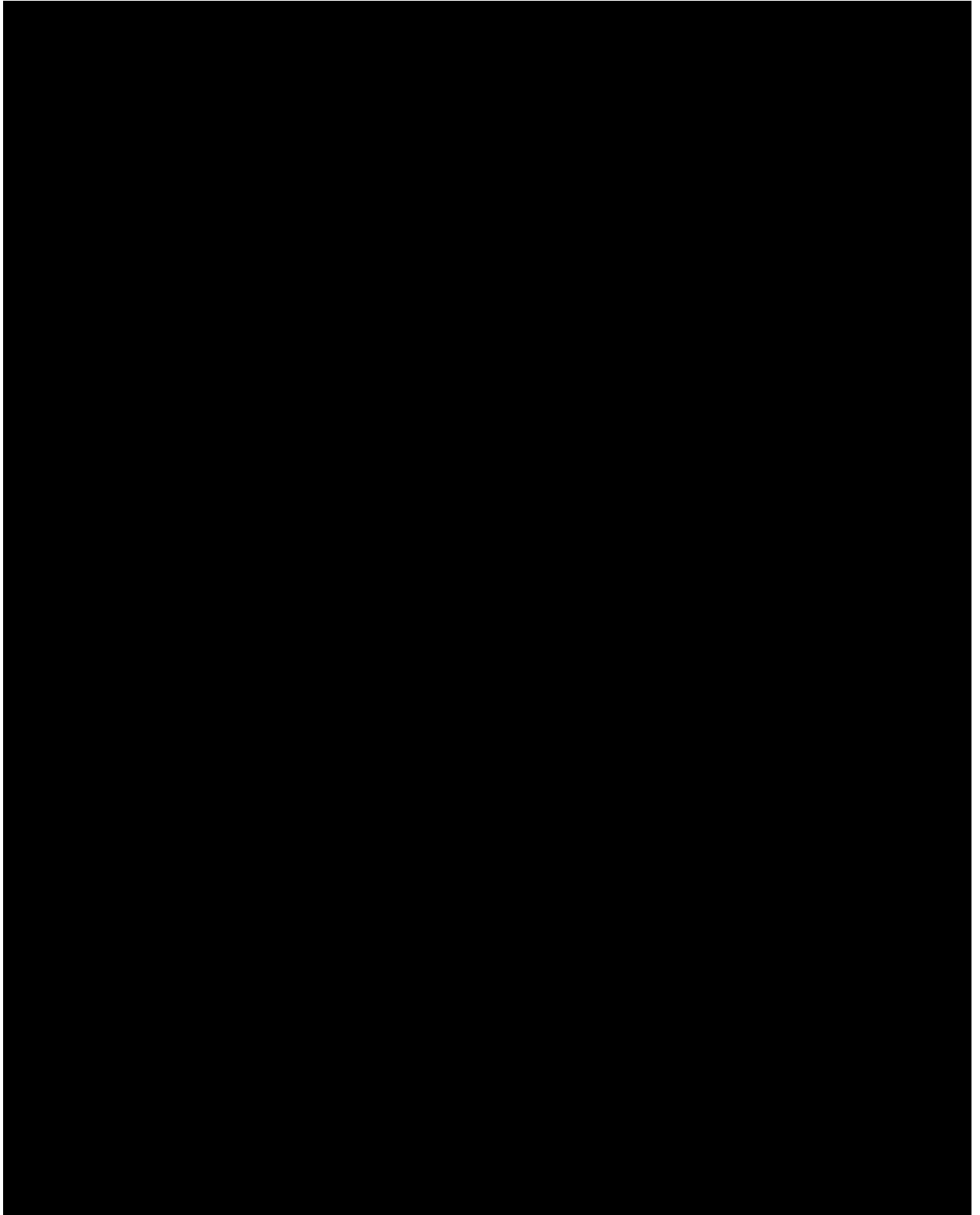
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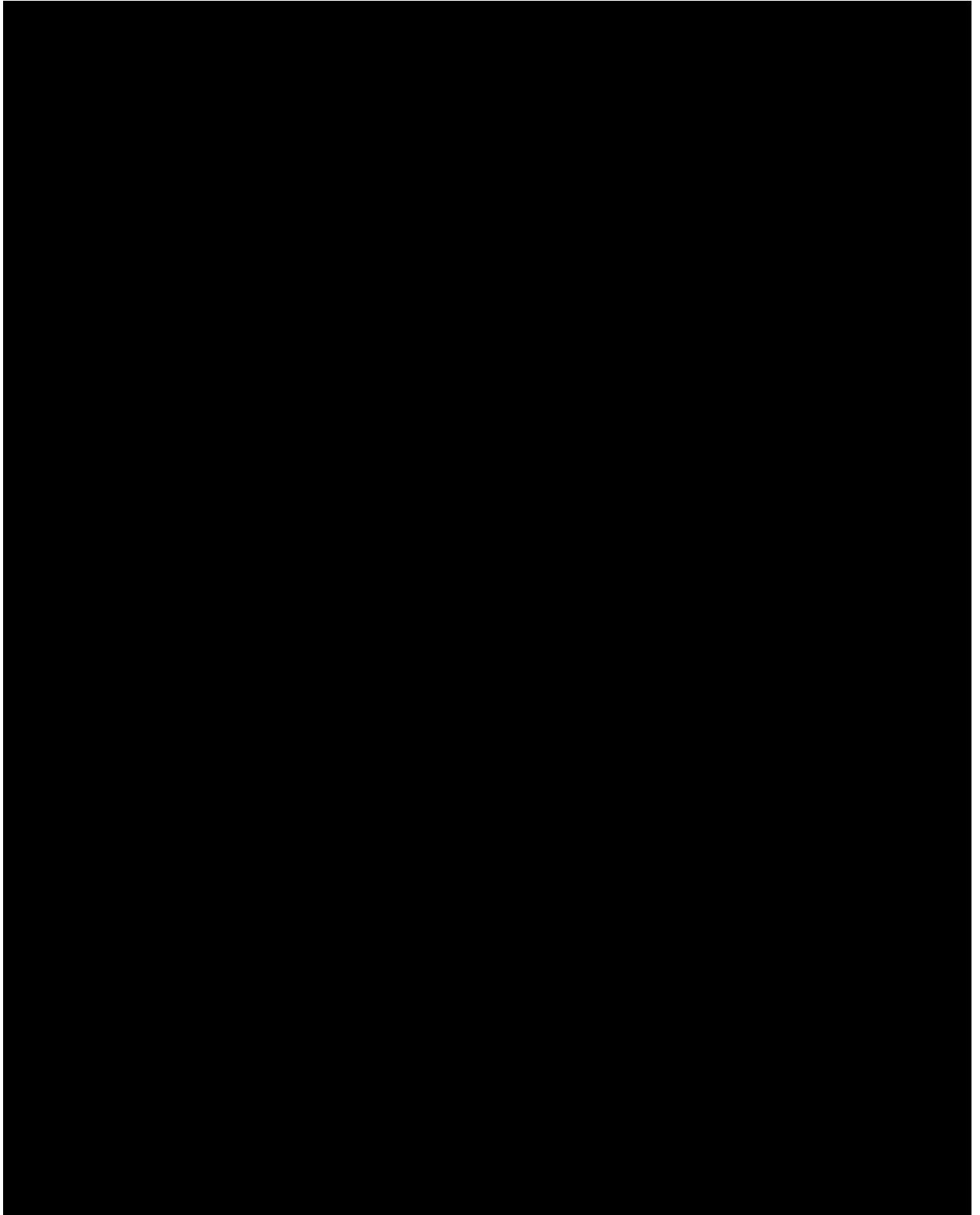
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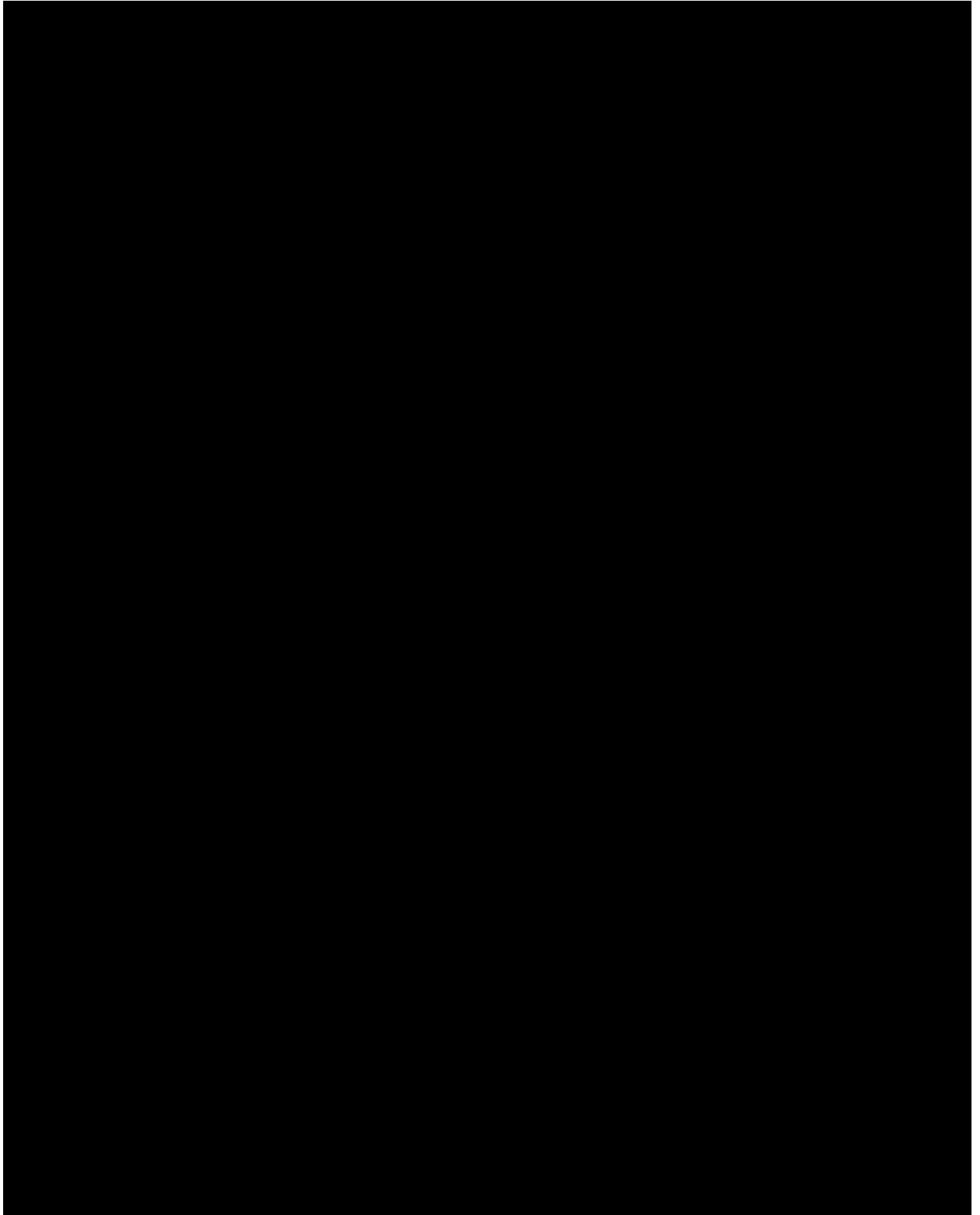
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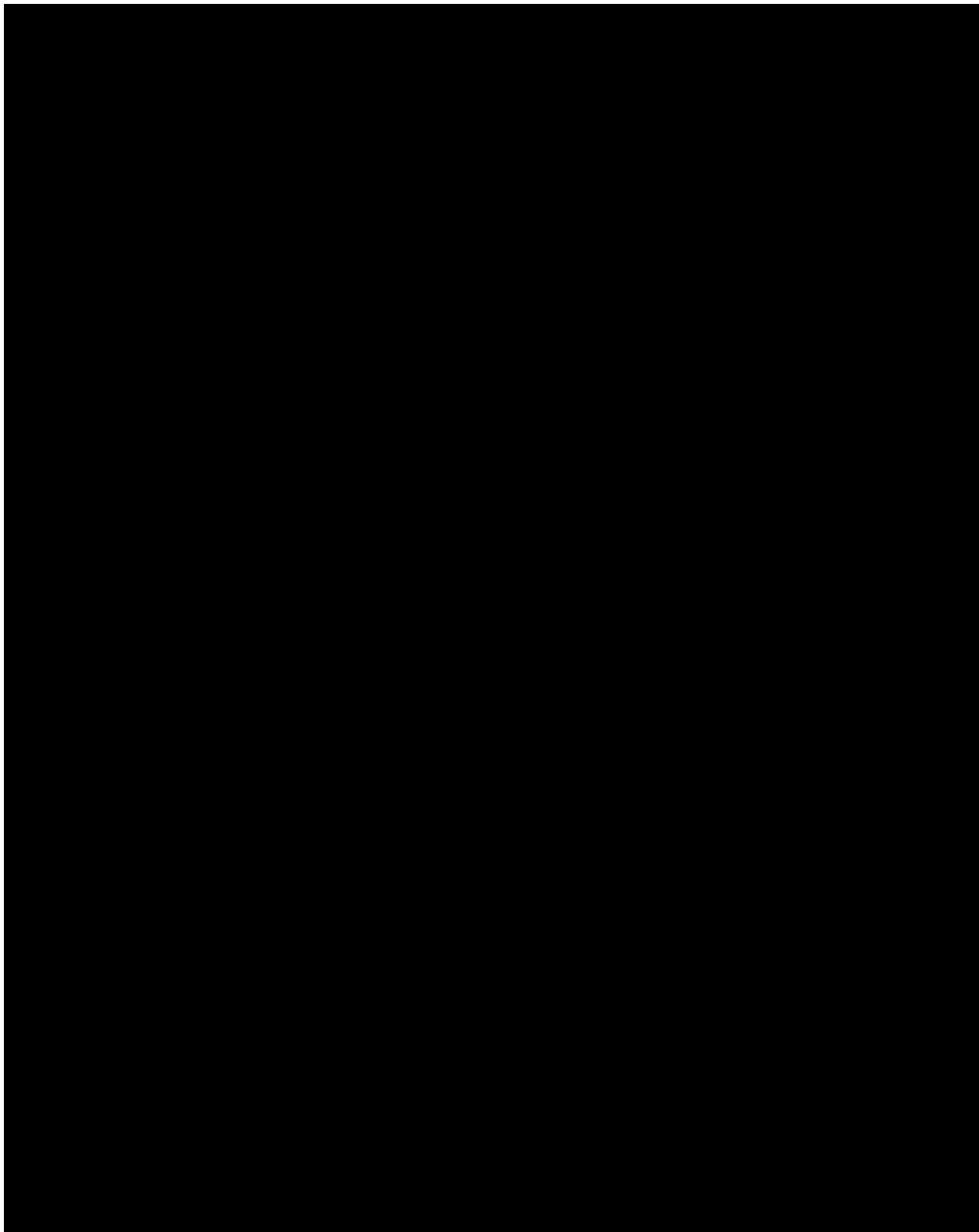
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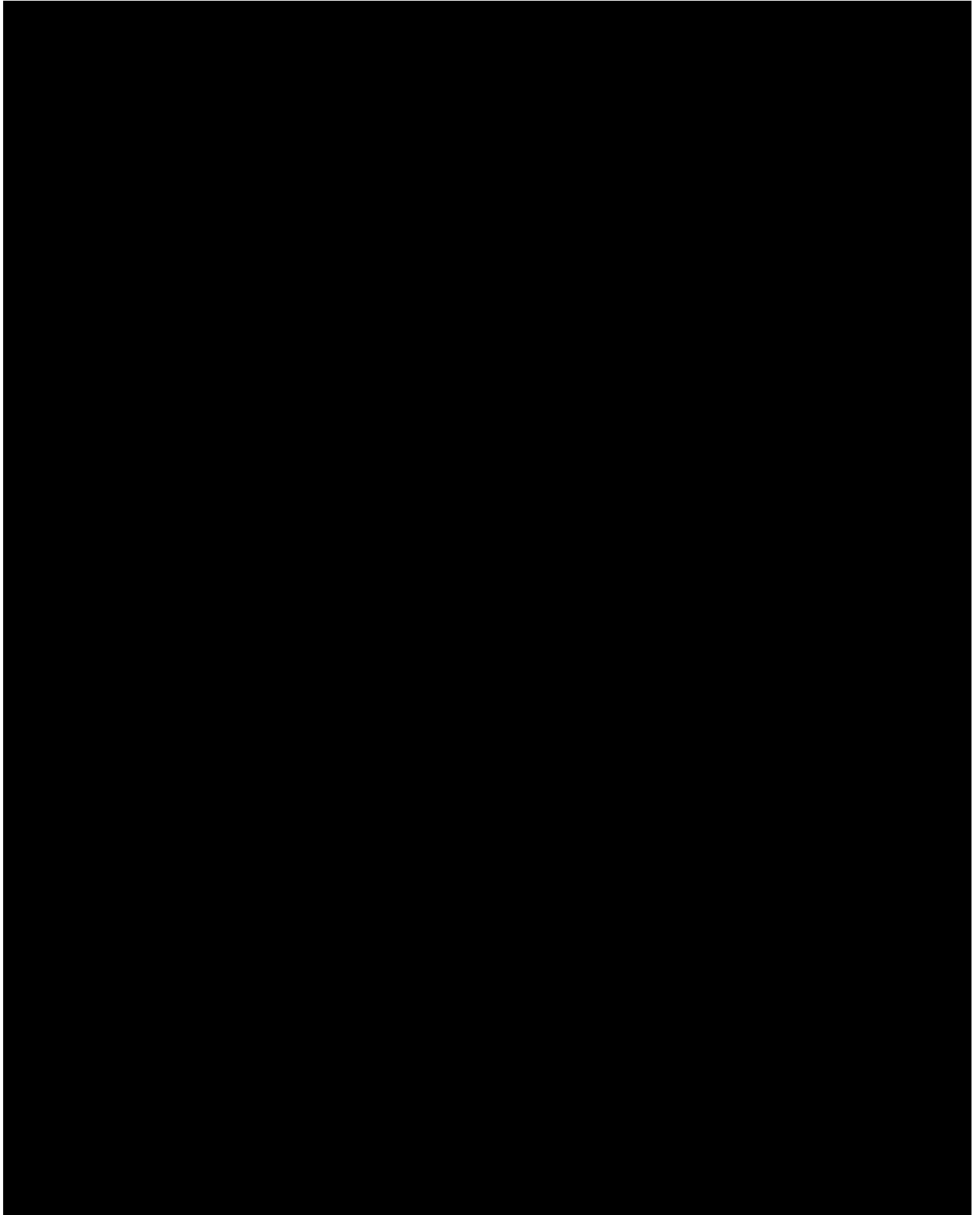
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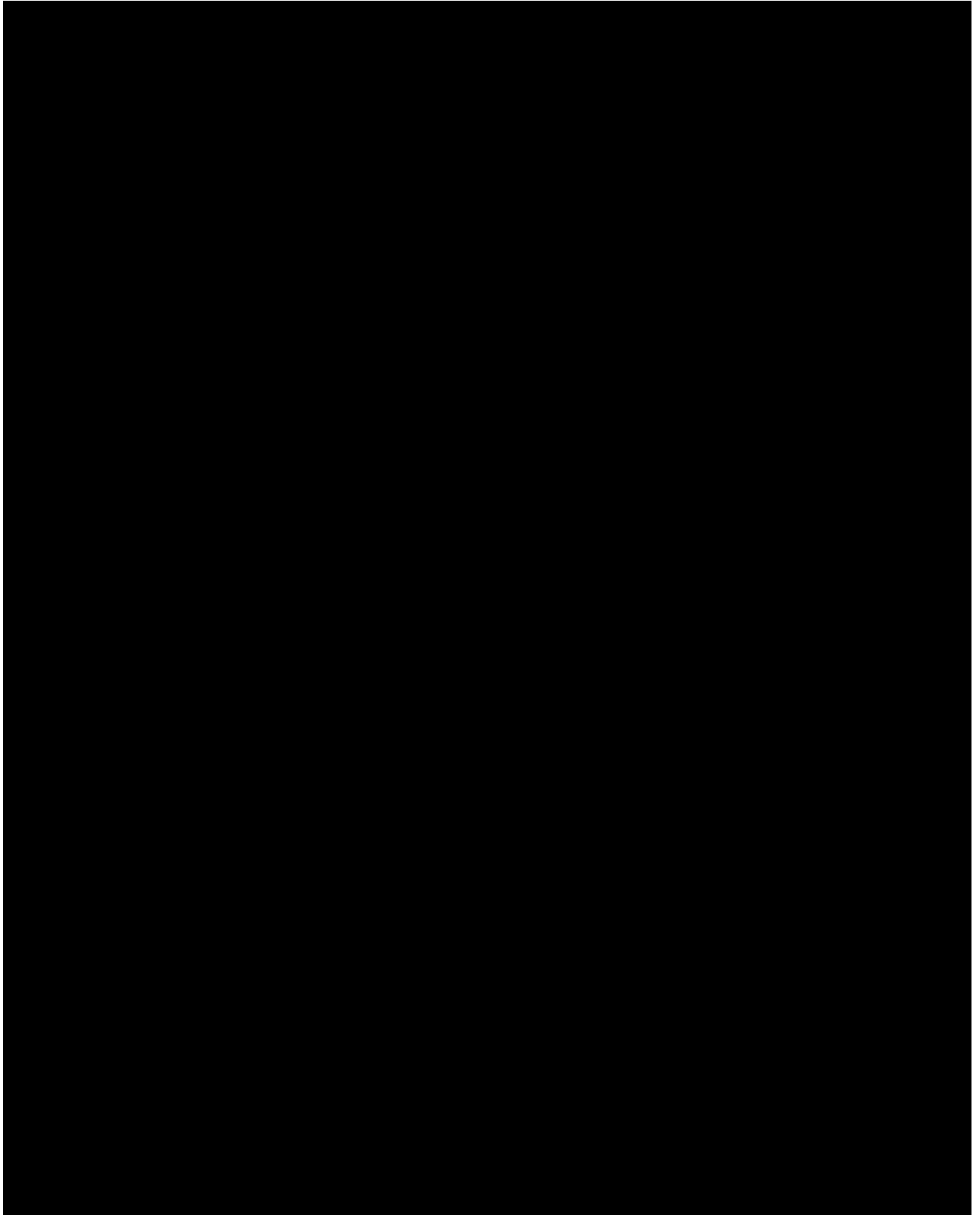
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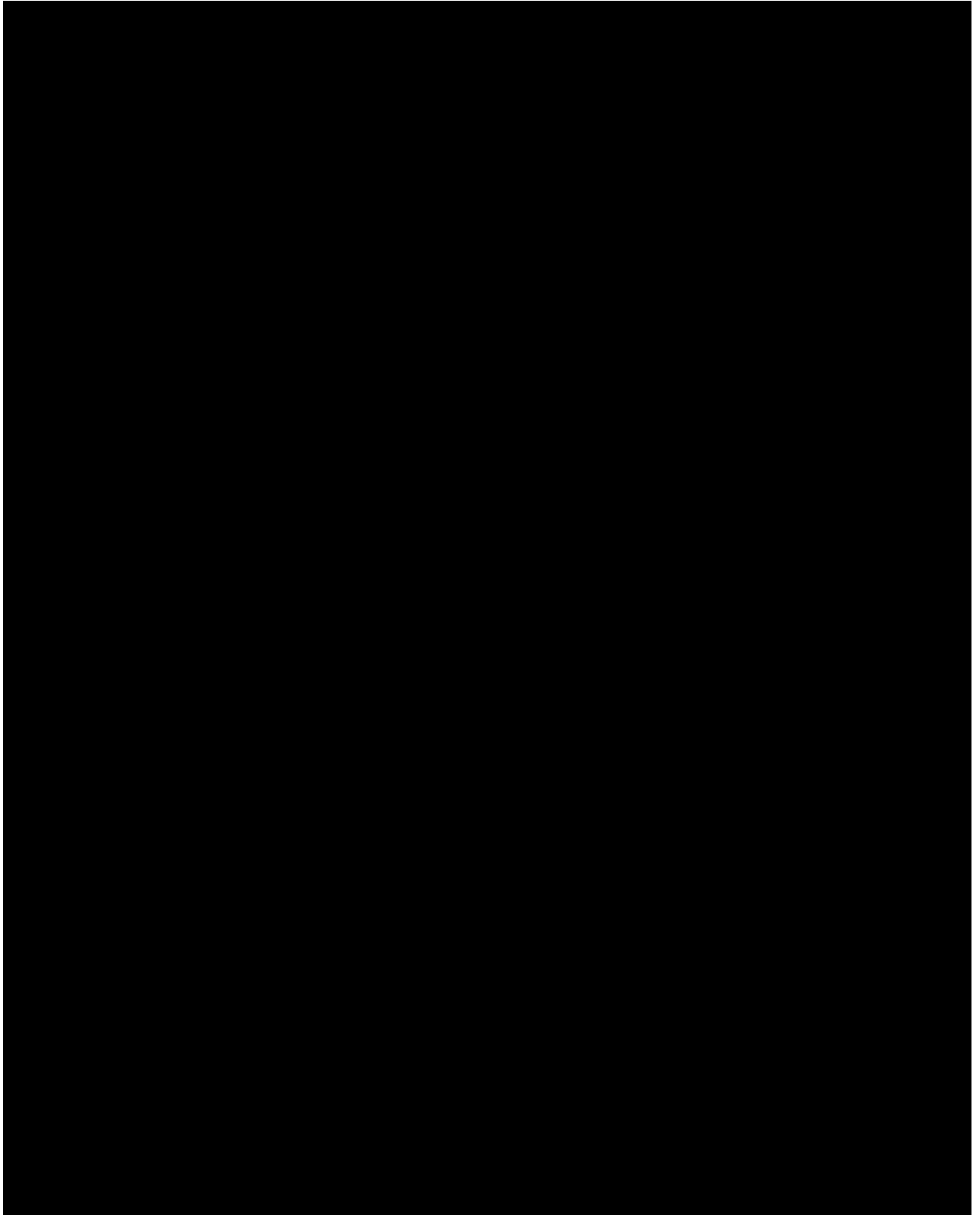
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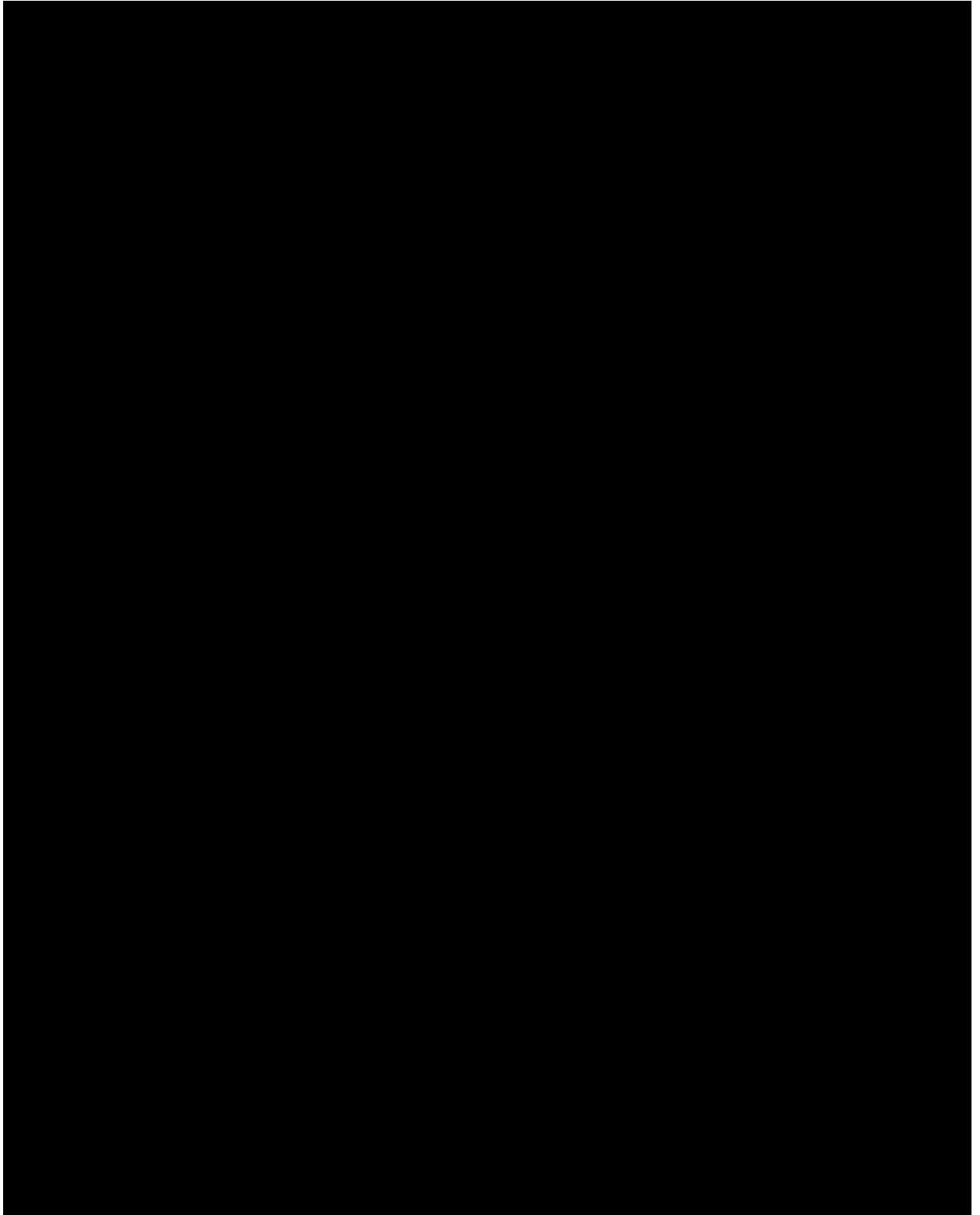
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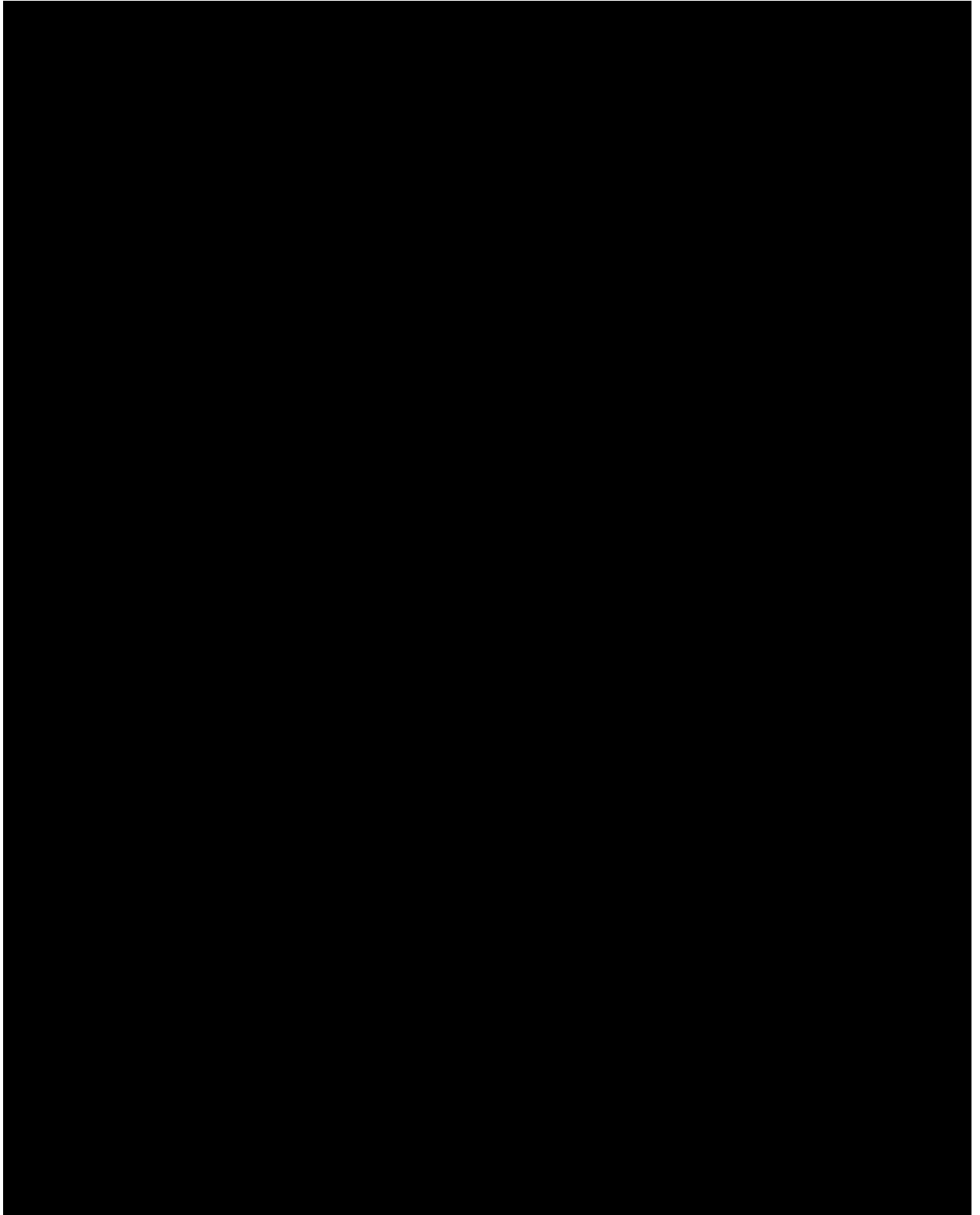
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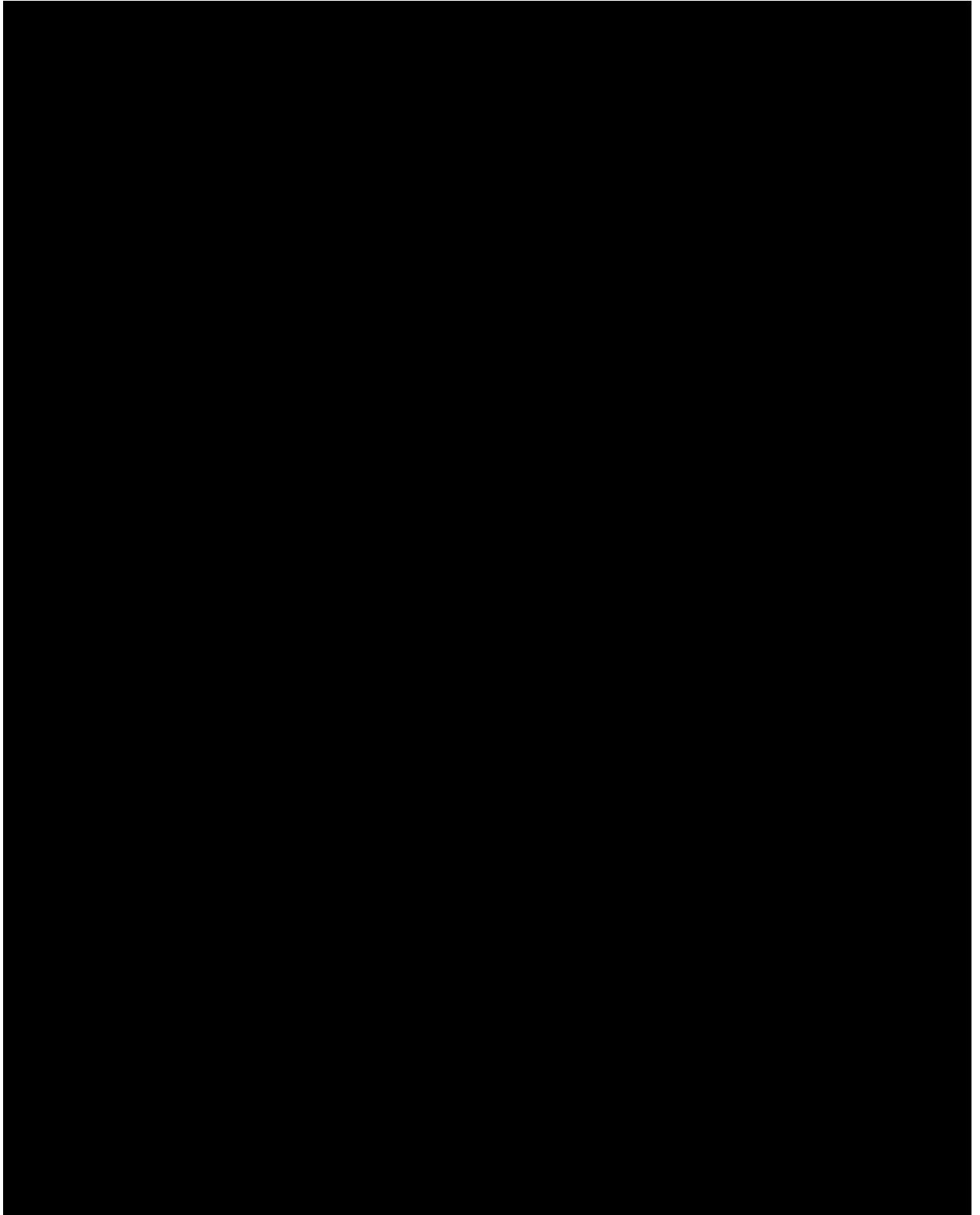
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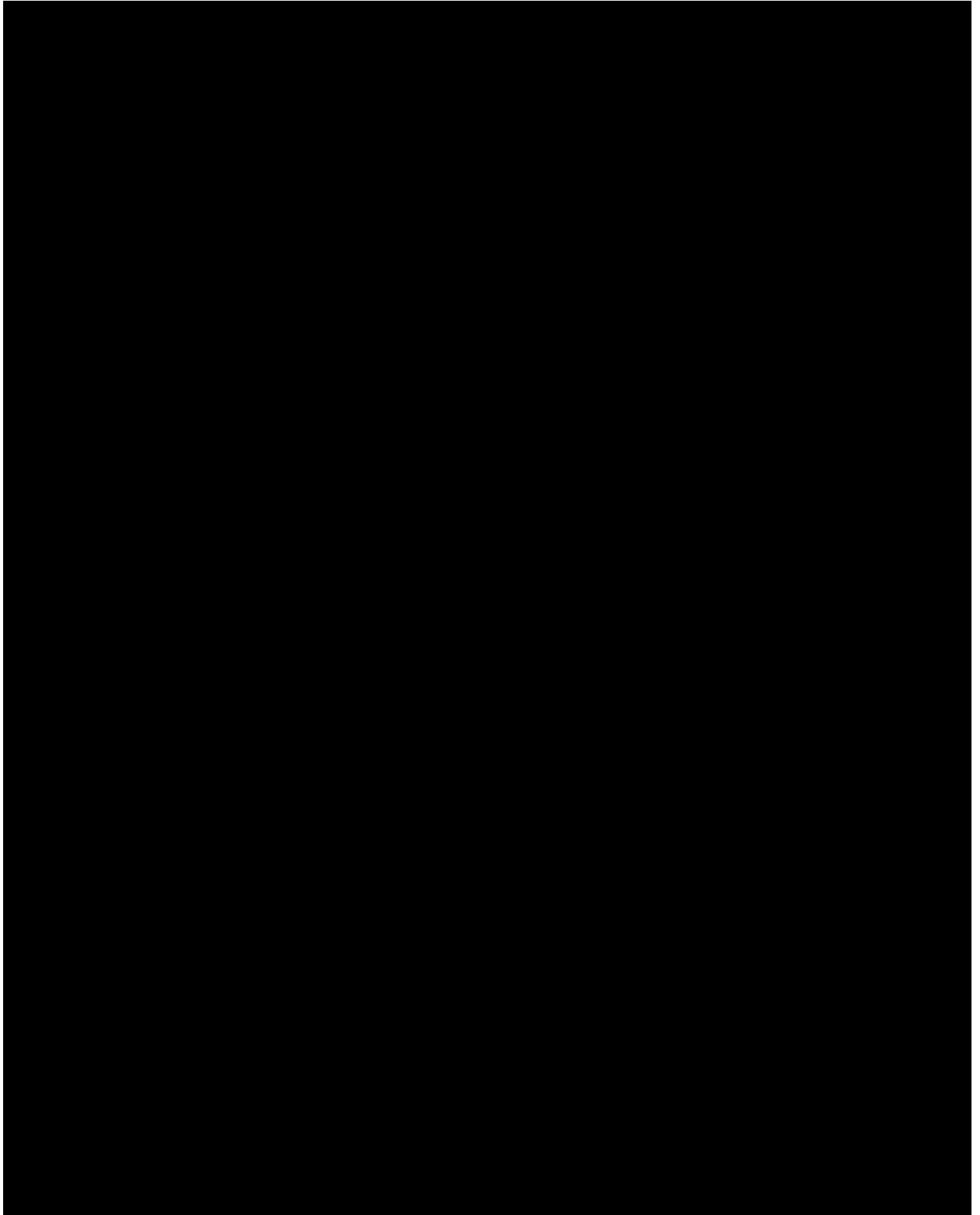
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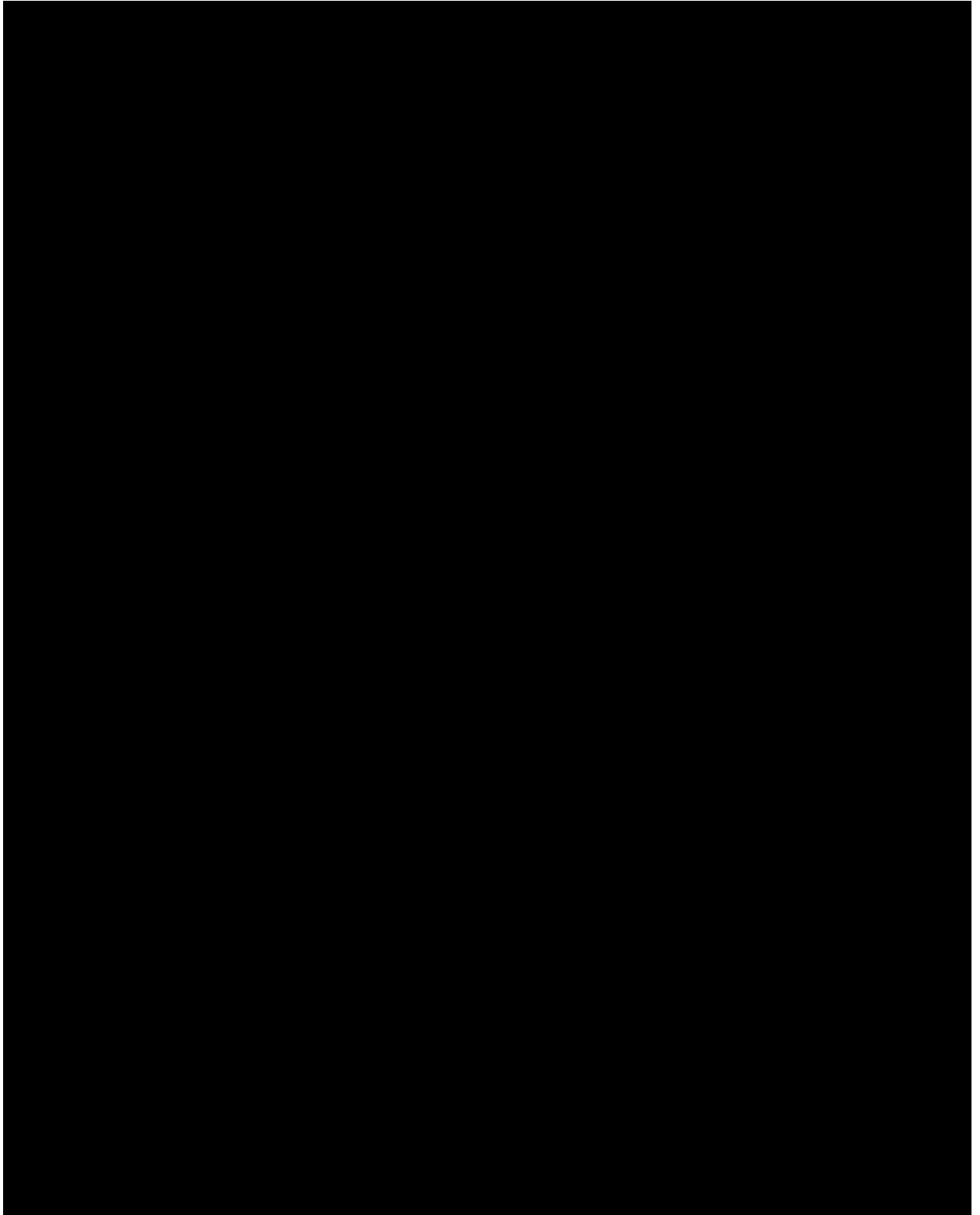
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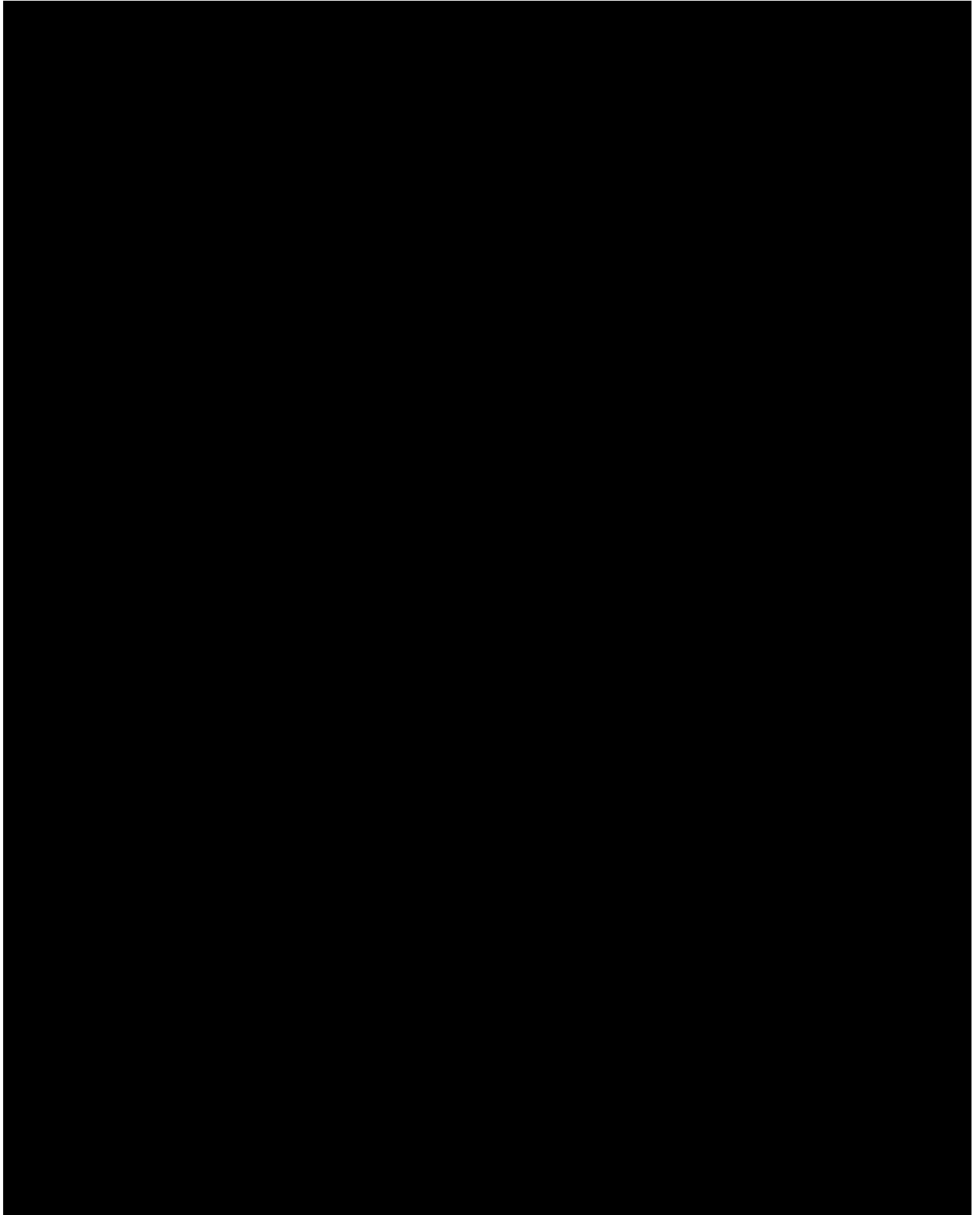
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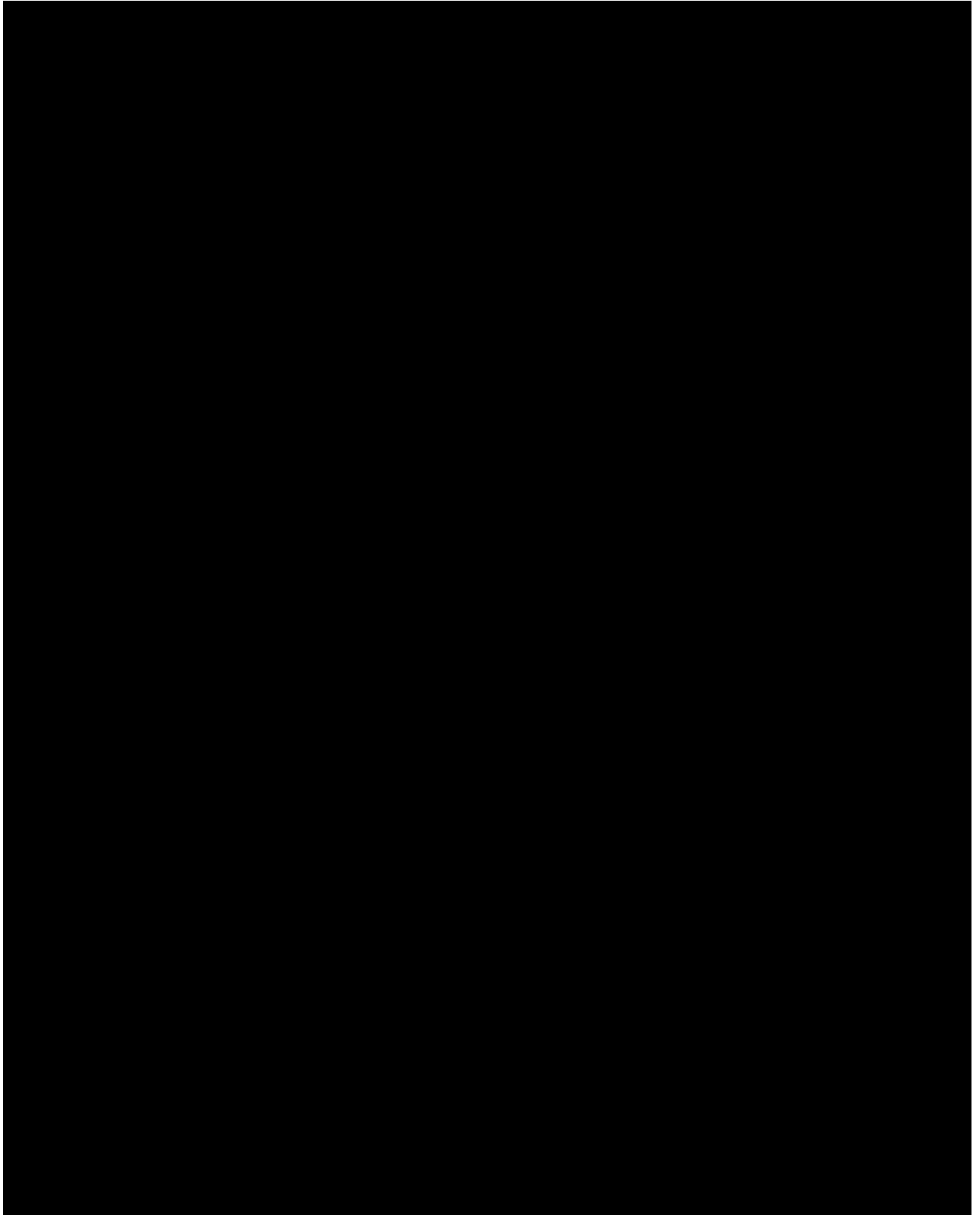
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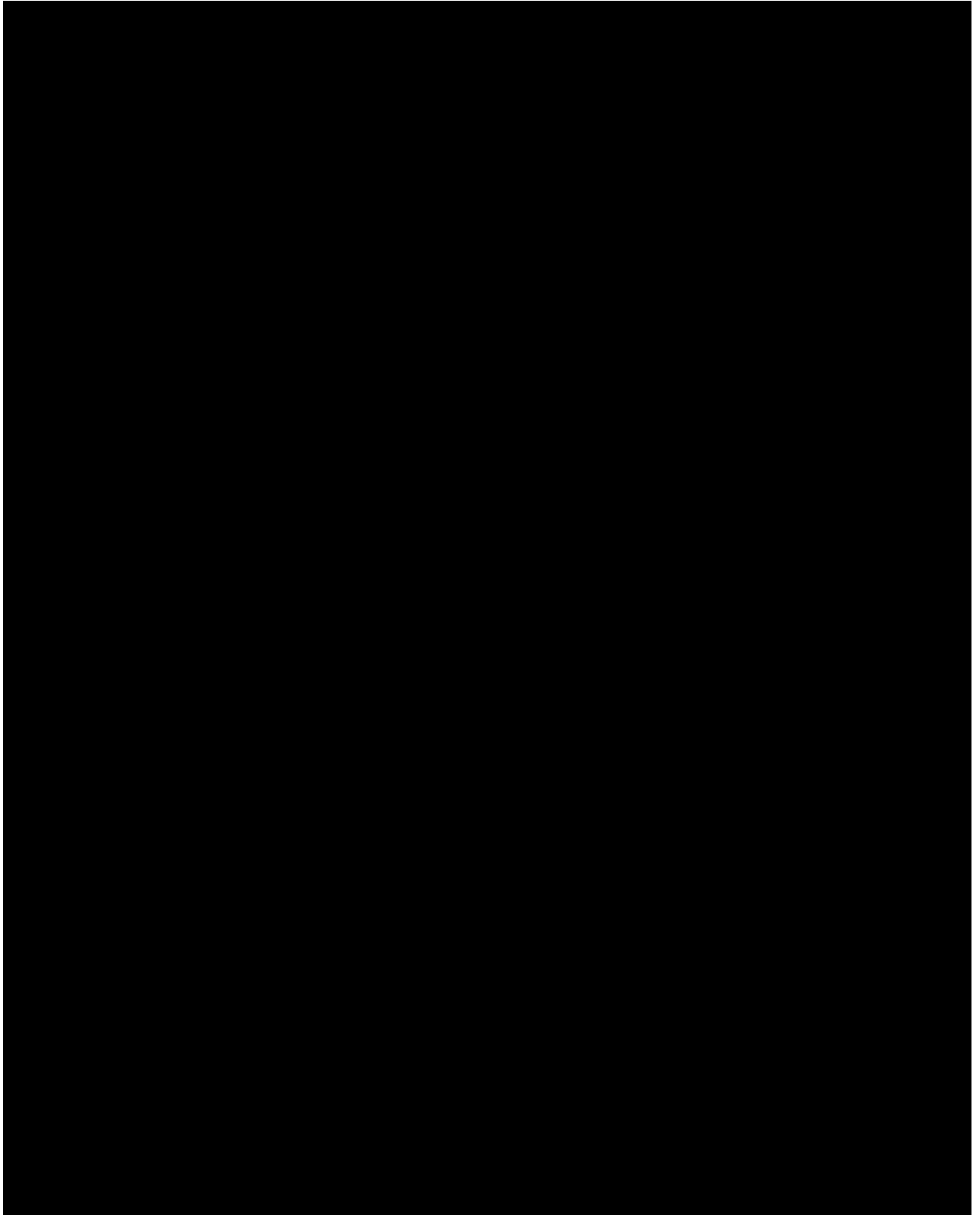
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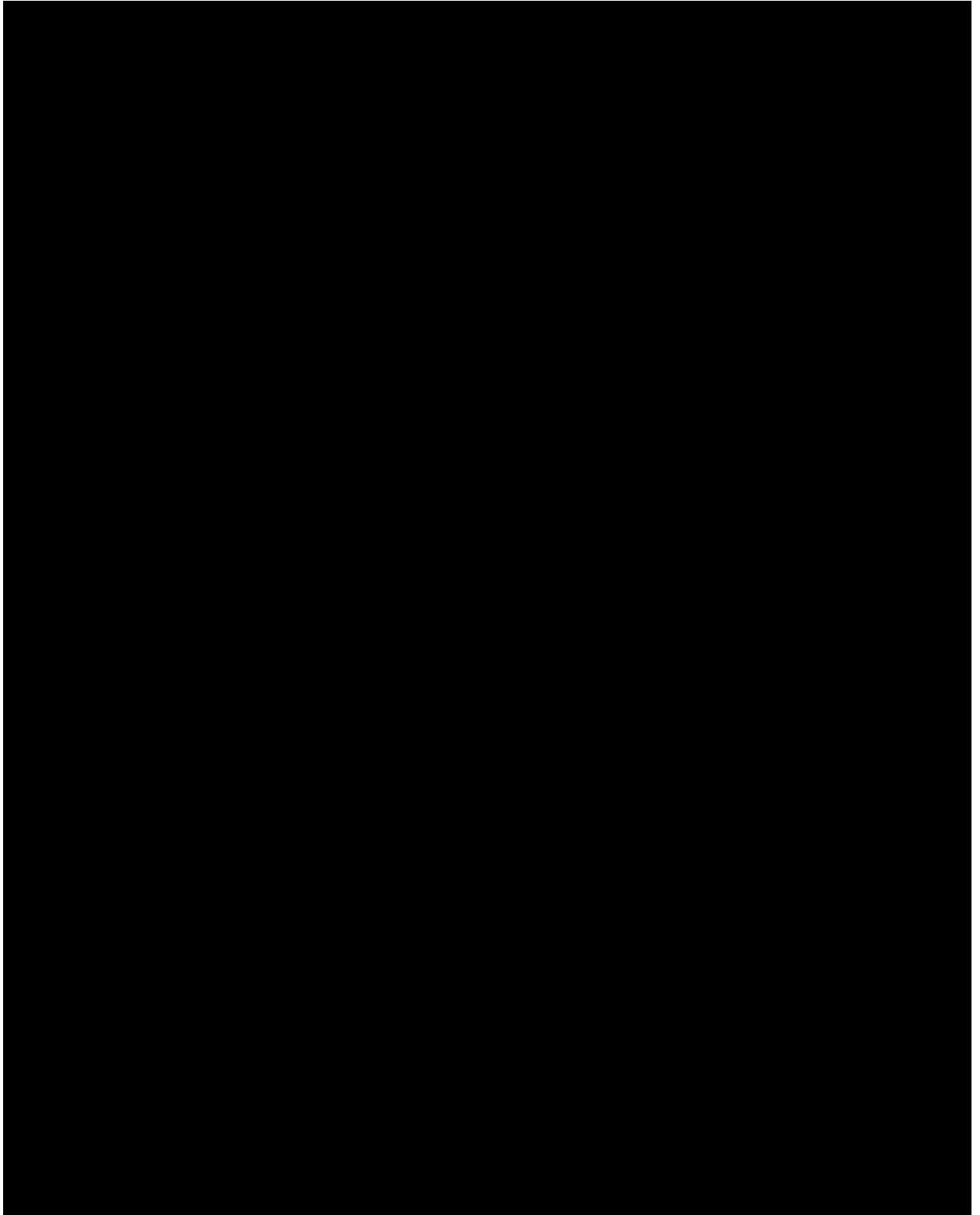
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Intuit, Inc.

11/30/2022

1 DISTRICT OF COLUMBIA, to wit:

2

3 I, Sally Jo Quade, RPR, the officer before whom
4 the foregoing deposition was taken, do hereby certify
5 that the within-named witness personally appeared before
6 me at the time and place herein set out, and after
7 having been duly sworn by me, according to law, was
8 examined by counsel.

9 I further certify that the examination was
10 recorded stenographically by me and this transcript is a
11 true record of the proceedings.

12 I further certify that I am not of counsel to any
13 of the parties, nor an employee of counsel, nor related
14 to any of the parties, nor in any way interested in the
15 outcome of this action.

16 As witness my hand and notarial seal this 14th
17 day of December, 2022.

18 

19 Sally Jo Quade, RPR
20 Notary Public

21 MY COMMISSION EXPIRES:

22 7/14/2023

23

24

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For The Record, Inc.
(301) 870-8025 - www.ftrinc.net - (800) 921-5555

Intuit, Inc.



11/30/2022

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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

I hereby certify, under penalty of perjury, that I have affixed my signature hereto on the date so indicated.

DATED:

For The Record, Inc.
(301) 870-8025 - www.ftrinc.net - (800) 921-5555

Intuit, Inc.



11/30/2022

1 WITNESS: [REDACTED]

2 DATE: NOVEMBER 30, 2022

3 CASE: In Re: INTUIT, INC.

4 Please note any errors and the corrections thereof on
5 this errata sheet. The rules require a reason for any
6 change or correction. It may be general, such as "To
7 correct stenographic error," or "To clarify the record,"
8 or "To conform with the facts."

7 PAGE LINE CORRECTION REASON FOR CHANGE

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