

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	C.A. No. 13-919-JLH
v.)	
)	
GOOGLE LLC,)	
)	
Defendant.)	

**DECLARATION OF GABE MATTERA IN SUPPORT OF GOOGLE’S MOTION TO
REDACT TRANSCRIPT AND SEAL CERTAIN EXHIBITS**

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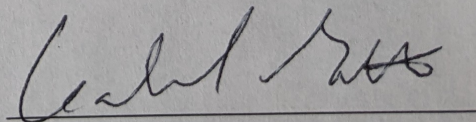
I, Gabriel Mattera, declare as follows:

1. I am a Finance Director at Google, where I have been employed since September 4, 2007. As part of my duties at Google, I am responsible for Central Financial Planning & Analysis for Devices & Services. Devices & Services includes Google's Pixel devices.
2. I am providing this declaration to describe the extraordinarily sensitive and valuable nature of Google's highly confidential financial information. This declaration is based on my personal knowledge.
3. I have reviewed a partially redacted copy of the trial transcript for the proceedings on May 1, 2023. I also reviewed two exhibits introduced into evidence by the plaintiff, exhibits 36 and 37. The transcript and exhibits contain highly confidential financial information of Google, including U.S. revenues for Pixel devices from 2017-2018, and U.S. revenues for certain Google Apps from 2011-2018, including Gmail, Docs, Chrome, Drive and Calendar.

4. While Google makes some financial information available to the public in its public financial statements, Google does not provide publicly the detailed breakdowns of U.S. only product-based financial information as it was discussed during this trial.
5. Public disclosure of the aforementioned information would severely harm Google because the information could be used adversely by Google's competitors. For example, visibility into Google highly confidential consumer revenues, if combined with data on unit sales, would give competitors an understanding of Google's product pricing and unit economics, and allow them to formulate specific pricing/discounting strategies for their own products. In addition, knowledge of Google's highly confidential financial information for these Pixel and Apps products that is more geographically limited than what is publicly reported would provide competitors with detailed information as to the success or failure of those products with customers in the U.S., and would give competitors better insights into how they should focus their own product strategies in order to better compete with Google in different geographic markets.
6. Only by keeping this highly confidential financial information in the strictest of confidence can Google protect itself from adverse exploitation of its highly confidential financial information by its competitors.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of May, 2023 in Washington, DC.



Gabriel Mattera