

1 SONAL N. MEHTA (SBN 222086)
WILMER CUTLER PICKERING
2 HALE AND DORR LLP
2600 El Camino Real, Suite 400
3 Palo Alto, CA 94306
Telephone: (650) 858-6000
4 Facsimile: (650) 858-6100
Sonal.Mehta@wilmerhale.com

DAVID Z. GRINGER (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich St.
New York, NY 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888
David.Gringer@wilmerhale.com

5 SETH P. WAXMAN (*pro hac vice*)
6 HOWARD M. SHAPIRO (*pro hac vice*)
JONATHAN E. PAIKIN (*pro hac vice*)
7 DEREK A. WOODMAN (*pro hac vice*)
WILMER CUTLER PICKERING
8 HALE AND DORR LLP
1875 Pennsylvania Ave NW
9 Washington, DC 20006
Telephone: (202) 663-6000
10 Facsimile: (202) 663-6363
Seth.Waxman@wilmerhale.com
11 Howard.Shapiro@wilmerhale.com
Jonathan.Paikin@wilmerhale.com
12 Derek.Woodman@wilmerhale.com

13 *Attorneys for Defendant*
14 INTUIT INC.

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 FEDERAL TRADE COMMISSION,
20

21 Plaintiff,

22 v.

23 INTUIT INC.,
24

25 Defendant.

Case No. 3:22-cv-01973-CRB

**DEFENDANT INTUIT INC.'S NOTICE OF
SETTLEMENT AND WITHDRAWAL OF
ADMINISTRATIVE MOTION TO FILE
TEMPORARILY UNDER SEAL
CONFIDENTIAL NOTICE OF RECENT
DEVELOPMENT AND DECLARATION OF
THOMAS HENRY**

1 Defendant Intuit Inc. files this Notice to apprise the Court that it has entered a public,
2 nationwide settlement with the State Attorneys General of all 50 states and the District of Columbia
3 to settle potential claims related to Intuit's marketing of its online tax-preparation products. Copies
4 of Assurances of Voluntary Compliance entered into with New York and Texas, both of which
5 memorialize the settlement, are attached hereto as Exhibits A and B. Substantively identical
6 agreements have been filed in other state courts pursuant to those states' laws. Intuit did not admit
7 liability in the settlement, and if necessary, it will continue to defend its practices in this litigation and
8 the FTC administrative proceeding.

9 In connection with the recent TRO Hearing, Intuit filed an administrative motion (ECF No.
10 58) notifying the Court that a settlement in principle had been reached, and requesting that the
11 information remain under seal until the settlement was finalized and publicly announced. The FTC
12 opposed the request to temporarily seal (ECF No. 63), which, because it also discussed the settlement
13 was itself subject to an administrative motion to seal (ECF Nos. 64 and 67). Now that the settlement
14 is public, the basis for sealing has expired and the following documents can be unsealed and placed
15 on the public docket:

- 16 • Intuit's Confidential Notice of Recent Development and Declaration of Thomas Henry
17 in Support of Intuit's Administrative Motion to File Temporarily Under Seal, filed on
18 April 20, 2022 (ECF Nos. 58-2 and 58-3).
- 19 • FTC's Opposition to Intuit's Administrative Motion to File Temporarily Under Seal,
20 filed on April 22, 2022 (ECF No. 64-1).

21 To avoid any confusion, Intuit's Statement Responding to Plaintiff's Administrative Motions
22 to Consider Whether Another Party's Material Should Be Sealed and Administrative Motion to Strike
23 Exhibits (ECF No. 56), to which the FTC responded (ECF No. 65), remains pending. The documents
24 at issue in that administrative motion do not relate to the settlement.

25
26
27 Dated: May 4, 2022

Respectfully submitted,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By: /s/ David Z. Gringer
David Z. Gringer (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich St.
New York, NY 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888
David.Gringer@wilmerhale.com

Sonal N. Mehta (SBN: 222086)
WILMER CUTLER PICKERING
HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000
Facsimile: (650) 858-6100
Sonal.Mehta@wilmerhale.com

Seth P. Waxman (*pro hac vice*)
Howard M. Shapiro (*pro hac vice*)
Jonathan E. Paikin (*pro hac vice*)
Derek A. Woodman (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Ave NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
Seth.Waxman@wilmerhale.com
Howard.Shapiro@wilmerhale.com
Jonathan.Paikin@wilmerhale.com
Derek.Woodman@wilmerhale.com

Attorneys for Defendant Intuit Inc.