

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GANNETT CO., INC.

*Plaintiff,*

-against-

GOOGLE LLC and ALPHABET INC.,

*Defendants.*

CIVIL ACTION NO. 1:23-cv-5177

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF  
JURY TRIAL DEMANDED**

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## INTRODUCTION

1. Plaintiff Gannett Co., Inc. is a digitally focused media and marketing solutions company that owns over 500 digital news and media brands, including *USA TODAY* and its network of local properties in the United States and the United Kingdom, as well over 200 daily print news media brands. By total daily circulation, Gannett is the largest news media publisher in the United States.

2. For centuries, Gannett has been in the business of local news — its oldest newspaper, the *Poughkeepsie Journal Sentinel*, has been in circulation since 1785. Today, 43 states are home to a Gannett publication, including longstanding local papers like *Detroit Free Press*, *Indianapolis Star*, and *Arizona Republic*. Gannett’s newspapers deliver leading national news and the local stories that bind our communities together and encourage civic engagement.

3. As Gannett’s readers have moved online, its publications have innovated to provide sophisticated and engaging content on the internet. For example, *USA TODAY* has been a pioneer in reader-friendly charts and graphics for decades. Gannett’s local publications have adopted video formats and photo galleries to deliver the news. And, most importantly, the internet has made it possible for Gannett’s publications to circulate more news stories and reach a wider audience. Never before has there been a greater opportunity for readers to get the news.

4. Digital news publishing also has opened a new frontier for news and other publications to earn revenue: digital advertising. Now publishers can do more than negotiate print advertising deals on an advertiser-by-advertiser basis. Across its publications, Gannett can use sophisticated, enterprise-level software to auction off ad space to advertisers who want to display an ad on a particular page to a particular user. Because ad space is bought and sold electronically, Gannett can sell *millions* of ad slots (called “impressions”) *every day*.

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