

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

VISA INC.,

Defendant.

Case No. 1:24-cv-07214-JGK-SLC

JOINT STATUS REPORT

Pursuant to the Joint Amended Scheduling and Case Management Order (ECF Nos. 97, 100) and as an update to the parties' previously filed Joint Status Reports (ECF Nos. 105 & 112), the parties provide the following joint status report as to their negotiations regarding the data to be produced by Visa in discovery and appropriate deadlines for production.

By way of background, the United States has served on Visa multiple requests for production that seek large quantities of electronic data. Among these requests are (a) one request (RFP 35) for debit network data underlying Visa's Global Business Intelligence ("GBI") tool, and (b) three requests (RFPs 38, 39, and 40) for Debit Processing Service ("DPS") data. The parties previously reported that they had concluded their discussions and come to agreement as to the scope and timing of Visa's DPS-related data productions. *See* ECF No. 105.

Regarding GBI-related data, the parties continue to make progress on their discussions and are substantially closer to finalizing the scope of data to be provided. As previously reported, the United States has identified six categories of GBI-related data for production, and within each of those categories, has identified particular data fields it seeks. Visa has objected to

certain of the United States' initial requests on the grounds of relevance and burden. Reserving all rights as to these claims, the United States has narrowed certain of those requests to address Visa's objections and the difficulties that Visa asserts are associated with the extraction of large data sets from Visa's system and continues to work with Visa to resolve any disputes. Visa has now provided sample reports related to all six categories of data, and the United States has provided Visa with its finalized data field requests for four of the six categories.¹ Visa is reviewing the revised field requests and reserves all objections, including as to burden while Visa continues to evaluate the feasibility of extracting such data for the full time period requested by Plaintiff. The parties will continue to negotiate and update the Court by October 21, 2025 as to the status of their conversations.

DATED: September 26, 2025

Respectfully submitted,

By: /s/ Christopher Jackson

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¹ The Division has been and continues to review the remaining samples and is working with Visa to resolve any potential issues.

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