February 6, 2026

**VIA ECF**

Honorable John G. Koeltl
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States of America v. Visa Inc.*, No. 1:24-cv-7214 (JGK)
*In re: Visa Debit Card Antitrust Litig.*, No. 1:24-cv-7435 (JGK)

Dear Judge Koeltl:

All parties in the two above-captioned related cases write jointly to provide a status update regarding a deposition protocol.

In case management orders (CMOs) recently entered in both cases, the parties explained their intent to file, within two weeks of the CMOs' entries, Deposition Protocol and Coordination Orders to facilitate the coordination of discovery between the actions. *See* Case No. 1:24-cv-7435, Dkt. No. 184 ¶ 7(c) (Jan. 15, 2026); Case No. 1:24-cv-7214, Dkt. No. 123 ¶ 14 (Jan. 22, 2026). The parties have worked diligently and cooperatively to reach agreement on a Protocol and have narrowed existing disputes but have not yet reached full agreement. The parties believe that with an extra week, they could narrow their disputes still further and perhaps reach consensus. Accordingly, the parties now intend to file a Deposition Protocol and Coordination Order in both matters within one week of this letter (February 13, 2026); if they are unable to reach consensus by that time, the parties will instead file a further status update by the same date.

Respectfully,

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