

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

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

LIVE NATION ENTERTAINMENT,
INC. and TICKETMASTER L.L.C.,

Defendants.

Case No. 1:24-cv-3973-AS

**DEFENDANTS' AMENDED DESCRIPTION OF COMMUNICATIONS AND
CERTIFICATION OF COMPLIANCE PURSUANT TO 15 U.S.C. § 16(g)**

On June 22, 2026, Defendants filed a description of communications and certification of compliance pursuant to 15 U.S.C. § 16(g). (ECF No. 1534.) That disclosure was complete and compliant with Section 16(g). In light of the decision in *United States v. Hewlett Packard Enterprise Co.*, No. 25-cv-00951-PCP, ECF No. 482 (N.D. Cal. Aug. 12, 2026), however, and out of an abundance of caution, Defendants submit this amended description to provide additional clarification regarding communications concerning or relevant to the Proposed Final Judgment.

Pursuant to Section 2(g) of the Antitrust Procedures and Penalties Act (“APPA”), 15 U.S.C. § 16(g), Defendants Live Nation Entertainment, Inc. (“Live Nation”) and Ticketmaster L.L.C. (collectively “Defendants”), by and through their undersigned counsel, submit the following description of all written or oral communications by, or on behalf of, Defendants with any officer or employee of the United States concerning or relevant to the Proposed Final Judgment filed in this action on June 12, 2026. In accordance with Section 2(g), this description excludes any communications “made by counsel of record alone with the Attorney General or the employees of

the Department of Justice alone,” and is limited to communications concerning or relevant to the Proposed Final Judgment.

To the best of Defendants’ knowledge, after appropriate inquiry, Defendants and their agents and advisors had in-person meetings, videoconferences, telephone calls, and written communications with officers or employees of the U.S. Department of Justice (“DOJ”), as well as members of the White House, principally with the Office of the White House Counsel, relating to the Proposed Final Judgment between February 2025 and June 12, 2026. These communications related to the negotiation of a potential settlement of the United States’ claims against Defendants, which was memorialized in a Term Sheet, dated March 5, 2026, and the Proposed Final Judgment, dated June 12, 2026. Listed below are the representatives of Defendants who substantively participated in one or more of these communications.

Michael Rapino (Live Nation President and Chief Executive Officer)
 Joe Berchtold (Live Nation President and Chief Financial Officer)
 Dan Wall (Live Nation Executive Vice President, Corporate and Regulatory Affairs)
 Richard Grenell (Live Nation Director)
 Adam Paris (Partner at Sullivan & Cromwell LLP, Live Nation advisor)
 James McDonald (Partner at Sullivan & Cromwell LLP, Live Nation advisor)
 Kyle Mach (Partner at Sullivan & Cromwell LLP, Live Nation advisor)
 Gabe Fleet (Partner at Latham & Watkins LLP, Live Nation advisor)
 Kellyanne Conway (Consultant at KAConsulting LLC, Live Nation advisor)
 William Levi (Partner at Sidley Austin LLP, Live Nation advisor)
 Mike Davis (Founder and Managing Partner at MRDLaw, Live Nation advisor)
 Devon Cavanagh (Ticketmaster Senior Vice President, Product)
 Taggart Matthiesen (Former Ticketmaster Chief Product Officer)

Between February 2025 and March 4, 2026, Live Nation and its representatives had numerous in-person meetings, videoconferences, telephone calls, and written communications with officers or employees of the DOJ, principally with the staff of the Antitrust Division (“Division”) of the DOJ and also including communications with the Office of the White House Counsel, related to the negotiation of a potential settlement of the United States’ claims against

Defendants. More specifically, between February and June 2025, representatives of Defendants including Messrs. Davis and Levi sought to open a dialogue with Division leadership about the case, including settlement possibilities. In June 2025 and thereafter, representatives of Defendants held meetings and discussions with persons within the DOJ Office of the Attorney General and officers or employees of the Division, which led to the commencement of settlement discussions with the Division in September 2025. Defendants made an initial settlement proposal to the Division in September 2025 and a formal written proposal in October 2025, which was countered in January 2026.

Settlement discussions occurred in February and March 2026 through numerous in-person meetings, videoconferences, telephone calls, and written communications among representatives of Defendants and officers or employees of the Division, the Offices of the Attorney General, Deputy Attorney General, and Associate Attorney General, and later the Office of the White House Counsel. Representatives of certain plaintiff states also attended settlement meetings in March 2026. These settlement discussions led to the March 5, 2026 Term Sheet and ultimately to the Proposed Final Judgment. In February 2026, President Donald J. Trump called Mr. Rapino to discuss issues related to the Kennedy Center; the President inquired about the status of the DOJ's lawsuit against Defendants but no substantive terms regarding any potential settlement were discussed. On March 5, 2026, representatives of Defendants, the Division, the Offices of the Attorney General, Deputy Attorney General, and Associate Attorney General, and the Office of the White House Counsel all met to finalize the material terms of the proposed settlement and the Term Sheet, which was signed that day. President Trump briefly appeared at this meeting but did not participate in any substantive settlement discussions.

The Proposed Final Judgment was formalized through additional discussions from late April through June 2026 and ultimately filed in this action by the Division on June 12, 2026.

Defendants certify that they have complied with the requirements of 15 U.S.C. § 16(g), and that the above description of communications is a true and complete description of relevant communications known to Defendants.

Dated: October 21, 2026

Respectfully submitted,

/s/ Adam S. Paris

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