

**U.S. House of Representatives**  
**Committee on the Judiciary**

Washington, DC 20515-6216  
One Hundred Sixteenth Congress

September 13, 2019

Mr. Tim Cook  
CEO  
Apple Inc.  
1 Infinite Loop  
Cupertino, CA 94025

Dear Mr. Cook:

The House Judiciary Committee is investigating competition in digital markets.<sup>1</sup> The focus of this bipartisan investigation is to examine (1) competition problems in digital markets; (2) whether dominant firms are engaging in anti-competitive conduct online; and (3) whether existing antitrust laws, competition policies, and current enforcement levels are adequate to address these issues.<sup>2</sup>

Under the Rules of the House of Representatives, the Committee's jurisdiction includes the protection of trade and commerce against unlawful restraints and monopolies,<sup>3</sup> as well as oversight of the antitrust laws and competition policy.<sup>4</sup>

As part of this work, we write to request that Apple Inc. (the "Company") provide the documents and executive communications set forth in the Schedule in accordance with the attached Definitions and Instructions no later than October 14, 2019.

Thank you for your prompt attention to these requests.

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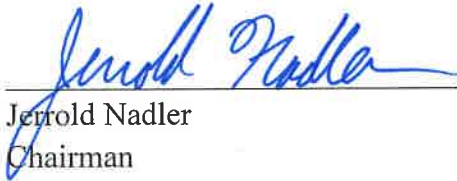
<sup>1</sup> Press Release, H. Comm. on the Judiciary, House Judiciary Committee Launches Bipartisan Investigation into Competition in Digital Markets (June 3, 2019) (on file at <https://judiciary.house.gov/news/press-releases/house-judiciary-committee-launches-bipartisan-investigation-competition-digital>).

<sup>2</sup> *Id.*

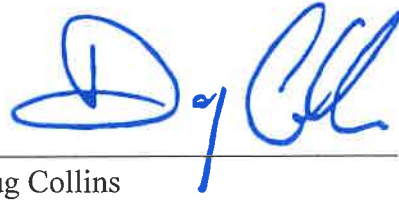
<sup>3</sup> RULES OF THE HOUSE OF REPRESENTATIVES, 116th Cong., 1st Sess., Rule X, cl. (1)(1)(16) (2019), available at <https://www.govinfo.gov/content/pkg/CPRT-116HPRT36537/pdf/CPRT-116HPRT36537.pdf>.

<sup>4</sup> RULES OF PROCEDURE, HOUSE COMMITTEE ON THE JUDICIARY, 116th Cong., Rule VI, cl. (b) (2019), available at [https://judiciary.house.gov/sites/democrats.judiciary.house.gov/files/documents/RulesofProcedureFinal.1\\_0.pdf](https://judiciary.house.gov/sites/democrats.judiciary.house.gov/files/documents/RulesofProcedureFinal.1_0.pdf).

Sincerely,



Jerrold Nadler  
Chairman  
Committee on the Judiciary  
U.S. House of Representatives



Doug Collins  
Ranking Member  
Committee on the Judiciary  
U.S. House of Representatives



David N. Cicilline  
Chairman  
Subcommittee on Antitrust,  
Commercial, and Administrative Law  
Committee on the Judiciary  
U.S. House of Representatives



F. James Sensenbrenner, Jr.  
Ranking Member  
Subcommittee on Antitrust,  
Commercial, and Administrative Law  
Committee on the Judiciary  
U.S. House of Representatives

## SCHEDULE

Please submit the following:

Request A. General Information:

1. The most recent organization chart for the Company as a whole and for each of the Company's U.S. divisions.
2. A description of each of the Company's products and services listed below:
  - a. App Store;
  - b. Apple Maps;
  - c. Apple Pay;
  - d. Apple TV;
  - e. Apple Watch;
  - f. Book Store;
  - g. HomePod;
  - h. iCloud;
  - i. iPhone;
  - j. iPad;
  - k. Mac; and
  - l. Siri.
3. All information—whether created by the Company or a third party—regarding the U.S. market share of the Company and each of the Company's competitors in any market in which the Company offers or sells the following products or services:
  - a. App Store;
  - b. Apple Maps;
  - c. Apple Pay;
  - d. Apple TV;
  - e. Apple Watch;
  - f. Book Store;
  - g. HomePod;
  - h. iCloud;
  - i. iPhone;
  - j. iPad;
  - k. Mac; and
  - l. Siri.
4. A list of the Company's top ten competitors for each of the products and services listed below and a description of why the Company views each of the companies identified as a competitor:

- a. App Store;
- b. Apple Maps;
- c. Apple Pay;
- d. Apple TV;
- e. Apple Watch;
- f. Book Store;
- g. HomePod;
- h. iCloud;
- i. iPhone;
- j. iPad;
- k. Mac; and
- l. Siri.

5. A list of the Company's top ten customers by revenue for each of the Company's products and services listed below:

- a. App Store;
- b. Apple Maps;
- c. Apple Pay;
- d. Apple TV;
- e. Apple Watch;
- f. Book Store;
- g. HomePod;
- h. iCloud;
- i. iPhone;
- j. iPad;
- k. Mac; and
- l. Siri.

6. All financial statements or reports prepared on an annual or quarterly basis by or on behalf of the Company since January 1, 2016, including profit-and-loss reports for each of the Company's products and services listed below:

- a. App Store;
- b. Apple Maps;
- c. Apple Pay;
- d. Apple TV;
- e. Apple Watch;
- f. Book Store;
- g. HomePod;
- h. iCloud;
- i. iPhone;
- j. iPad;

- k. Mac; and
- l. Siri.

If the Company does not prepare or maintain financial statements, including profit-and-loss statements, for the above-listed products or services in the ordinary course of business, the Company should (i) submit the revenues, costs, and expenses for each product or service listed; and (ii) use its best efforts to provide a profit-and-loss statement for each product or service.

- 7. All documents produced in any prior investigation or litigation involving a U.S. or foreign government entity, including U.S. state attorneys general offices, which were submitted to the U.S. or foreign government entity within the past ten years relating to any transaction that is reviewable under Section 7 of the Clayton Act or to allegations that the Company engaged in anti-competitive practices or otherwise violated antitrust laws.
- 8. A list of all cases filed against the Company in U.S. federal or state court by a non-state entity within the past ten years relating to any allegations that the Company engaged in anti-competitive practices or otherwise violated antitrust laws, including the relevant court, a summary of the allegations, and current status of the case.
- 9. All memoranda, white papers, studies, reports, surveys, presentations, or other analyses submitted by or on behalf of the Company to the U.S. Department of Justice's Antitrust Division, the Federal Trade Commission, or any other government entity within the past ten years relating to any transaction that is reviewable under Section 7 of the Clayton Act or to allegations that the Company, or any other company, engaged in anti-competitive practices or otherwise violated antitrust laws.

Request B. Executive Communications:

For purposes of Requests B.1-3, the term "Relevant Executives" means: Tim Cook, Katherine Adams, Eddy Cue, Philip Schiller, Johny Srouji, Dan Riccio, Jonathan Ive, Craig Federighi, Luca Maestri, Jeff Williams, Steve Dowling, Tor Myhren, Lucas Maestri, and Jane Horvath.

- 1. All communications to or from the Relevant Executives relating to the following:
  - a. Apple's decision to remove from the App Store or to impose any restrictions on certain screen-time and parental-control apps, including but not limited to, the following apps:
    - i. Freedom;
    - ii. Kidslox;
    - iii. Mobicip;
    - iv. OurPact; and

- v. Qustodio.<sup>1</sup>
- b. The App Store algorithm that determines the search ranking of apps in the App Store, including but not limited to, discussions examining whether Apple should modify this algorithm in any way.<sup>2</sup>
  - c. Apple's policy regarding whether and under what circumstances any specific app or any categories of apps in the App Store are permitted to use payment systems other than Apple's payment system.<sup>3</sup>
  - d. Apple's policy regarding whether apps are permitted to include in-app links to non-Apple payment systems.<sup>4</sup>
  - e. Apple's revenue-share policy for in-app purchases, including but not limited to, the precise percentage cut that Apple does or should take.<sup>5</sup>
  - f. Apple's policy regarding whether iPhone users can choose non-Apple apps as default apps, including but not limited to, defaults for web browsers, maps, e-mail client, maps services, or music players.<sup>6</sup>
  - g. Apple's policy regarding whether to allow on the iPhone any app stores other than the Apple App Store.
  - h. Apple's decision to "sherlock" any functionality from any specific third-party app or any categories of third-party apps, including but not limited to, discussions about Clue, Duet Display, and SwiftKey.<sup>7</sup>

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<sup>1</sup> See, e.g., Jack Nicas, *Apple Cracks Down on Apps That Fight iPhone Addiction*, N.Y. TIMES (Apr. 27, 2019), <https://www.nytimes.com/2019/04/27/technology/apple-screen-time-trackers.html?module=inline>.

<sup>2</sup> See, e.g., Jack Nicas & Keith Collins, *How Apple's Apps Topped Rivals in the App Store It Controls*, N.Y. TIMES (Sept. 9, 2019), <https://www.nytimes.com/interactive/2019/09/09/technology/apple-app-store-competition.html>.

<sup>3</sup> See, e.g., Chris Welch, *Apple's latest defense of the App Store just shows how hard it is to compete with Apple*, THE VERGE (May 29, 2019), <https://www.theverge.com/2019/5/29/18644045/apple-defends-app-store-policies-antitrust-eu-spotify>.

<sup>4</sup> *Id.*

<sup>5</sup> See, e.g., Issie Lapowsky, *Spotify's Apple Complaint Cuts to a Core Antitrust Issue*, WIRED (Mar. 13, 2019), <https://www.wired.com/story/spotify-apple-complaint-warren-antitrust-issue>.

<sup>6</sup> *Id.*

<sup>7</sup> See, e.g., Reed Albergotti, *How Apple uses its App Store to copy the best ideas*, Wash. Post (Sept. 5, 2019), <https://beta.washingtonpost.com/technology/2019/09/05/how-apple-uses-its-app-store-copy-best-ideas>.

- i. Apple's policy regarding whether third-party web browsers in the App Store must use any specific browser rendering engine, including but not limited to, WebKit.<sup>8</sup>
  - j. Apple's restrictions on third-party repairs, including but not limited to any rules with which Apple Authorized Service Providers (AASPs) must comply, such as rules restricting or prohibiting AASPs from making any specific repairs.<sup>9</sup>
  - k. Apple's decision in December 2017 to offer iPhone battery replacements at a discounted price, or the actual or projected effects of this decision, including but not limited to, effects on iPhone sales.<sup>10</sup>
  - l. Apple's decision to introduce the "Independent Repair Provider Program," including but not limited to, decisions covering which specific repair parts Apple will make available through the program and at what price.<sup>11</sup>
  - m. Apple's decision in 2018 to enter into an agreement with Amazon to sell Apple products on Amazon and to limit the resellers that can sell Apple products on Amazon.<sup>12</sup>
2. All communications to or from the Relevant Executives from January 1, 2009 to the present that discuss:
- a. Any prior investigation or litigation involving a U.S. or foreign government entity, including U.S. state attorneys general offices, within the past ten years relating to any transaction that is reviewable under Section 7 of the Clayton Act or to allegations that the Company engaged in anti-competitive practices or otherwise violated antitrust laws.
  - b. Any cases filed against the Company in U.S. federal or state court by a non-state entity within the past ten years relating to any allegations that the Company engaged in anti-competitive practices or otherwise violated antitrust laws.
  - c. Memoranda, white papers, studies, reports, surveys, presentations, or other analyses submitted by or on behalf of the Company to the U.S. Department of Justice's Antitrust

<sup>8</sup> See, e.g., Geoff Duncan, *How can the EU accuse Microsoft of stifling competition, but Apple gets a pass?*, DIGITAL TRENDS (Oct. 24, 2017), <https://www.digitaltrends.com/apple/how-can-the-eu-come-after-microsoft-for-anticompetiveness-but-apple-gets-a-pass>.

<sup>9</sup> See, e.g., Jason Koebler, *Internal Documents Show Apple Is Capable of Implementing Right to Repair Legislation*, MOTHERBOARD (Mar. 28, 2019), [https://www.vice.com/en\\_us/article/d3mqna/internal-documents-show-apple-is-capable-of-implementing-right-to-repair-legislation](https://www.vice.com/en_us/article/d3mqna/internal-documents-show-apple-is-capable-of-implementing-right-to-repair-legislation).

<sup>10</sup> See, e.g., Hayley Tsukayama, *Apple will offer discounts on repair batteries, following lawsuits over iPhone slowdowns*, WASH. POST (Dec. 28, 2017), <https://www.washingtonpost.com/news/the-switch/wp/2017/12/28/french-lawsuit-filed-against-apple-for-slowing-down-iphones-could-come-with-jail-time>.

<sup>11</sup> See, e.g., Jason Koebler, *Apple Will Finally Sell iPhone Parts to Repair Shops But Not to You*, MOTHERBOARD (Aug. 30, 2019), [https://www.vice.com/en\\_us/article/evjx9j/apple-will-finally-sell-iphone-parts-to-repair-shops-but-not-to-you](https://www.vice.com/en_us/article/evjx9j/apple-will-finally-sell-iphone-parts-to-repair-shops-but-not-to-you).

<sup>12</sup> See, e.g., Chaim Gartenberg, *Amazon strikes deal with Apple to sell new iPhones and iPads*, THE VERGE (Nov. 9, 2018), <https://www.theverge.com/2018/11/9/18079340/amazon-apple-iphone-ipad-watch-beats-deal-selling-products-online>.

Division, the Federal Trade Commission, or any other government entity within the past ten years relating to any transaction that is reviewable under Section 7 of the Clayton Act or to allegations that the Company, or any other company, engaged in anti-competitive practices or otherwise violated antitrust laws.

3. All communications to or from the Relevant Executives from January 1, 2009 to the present that discuss:
  - a. The Clayton Act, the Sherman Act, the Hart-Scott-Rodino Act, the Robinson-Patman Act, or the Federal Trade Commission Act.
  - b. Actual or potential actions by the Company or its officers or employees that were identified by the Company's officers or employees as raising issues concerning actual or potential violations of the Acts specified in Request B.3.a.



## DEFINITIONS

As used in the Schedule, the following terms shall be interpreted in accordance with these definitions:

1. “And,” and “or,” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of the request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa.
2. “Any” includes “all,” and “all” includes “any.”
3. “Communication(s)” means the transmittal of information by any means, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic message including email, text message, instant message, MMS or SMS message, encrypted message, message application, social media, or otherwise.
4. “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
5. “Employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
6. “Document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, call records, electronic mail (“e-mail”), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, power point presentations, spreadsheets, and work sheets. The term “document” includes all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to the foregoing, as well as any attachments or appendices thereto.
7. “Documents in the Company’s possession, custody, or control” means (a) documents that are in the Company’s possession, custody, or control, whether held by the Company or the Company’s

past or present agents, employees, or representatives acting on the Company's behalf; (b) documents that the Company has a legal right to obtain, that the Company has a right to copy, or to which the Company has access; and (c) documents that have been placed in the possession, custody, or control of any third party. This includes but is not limited to documents that are or were held by the Company's attorneys.

8. "Each" shall be construed to include "every," and "every" shall be construed to include "each."
9. "Government" shall include any government's present and former agencies, branches, units, divisions, subdivisions, districts, public corporations, employees, elected and appointed officials, ambassadors, diplomats, emissaries, authorities, agents, assignees, and instrumentalities. This includes, but is not limited to, any government-controlled business entities, entities in which the government has a financial interest, and any person acting or purporting to act on the government's behalf.
10. "Including" shall be construed broadly to mean "including, but not limited to."
11. "Information" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: documents, memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, call records, electronic mail ("e-mail"), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, power point presentations, spreadsheets, and work sheets.
12. "Person" or "persons" means natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units, thereof.
13. "Relating to" or "regarding" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, comprising, showing, setting forth, considering, recommending, concerning, or pertinent to that subject in any manner whatsoever.
14. "Communications to or from" includes communications on which a person was an addressee, copied addressee, or blind-copied addressee.
15. Any word or term that the Company considers vague or insufficiently defined has the meaning most frequently assigned to it by the Company in the ordinary course of business.

## INSTRUCTIONS

1. In responding to the request, the Company should produce all responsive documents in unredacted form that are in the Company's possession, custody, or control or otherwise available to the Company, regardless of whether the documents are possessed directly by the Company.
2. Documents responsive to the request should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
3. If you disagree with the premise of how a request is phrased or structured, please respond to the request as written and then articulate both the premise about which you disagree and the basis for that disagreement.
4. In addition to the individuals listed as "Relevant Executives," each Party must also search (a) the files of any predecessors or successors of the individuals identified on the "Relevant Executives" list in B.1. that are responsive to the request; (b) the files of secretaries and other administrative personnel who support any of the individuals identified as "Relevant Executives"; and (c) any centralized hard-copy or electronic files, databases, data sets, or other shared repositories of potentially responsive information.
5. In the event that a document is withheld in full or in part on any basis, including a claim of privilege, the Company should provide a log containing the following information concerning every such document: (a) the reason the document is not being produced; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) any other description necessary to identify the document and to explain the basis for not producing the document. For each document withheld under a claim that it constitutes or contains attorney work product, also state whether the Company asserts that the document was prepared in anticipation of litigation or for trial and, if so, identify the anticipated litigation or trial upon which the assertion is based. For each author, addressee, and recipient, state the Person's full name, title, and employer or firm and denote all attorneys acting in a legal capacity with an asterisk. Include a separate legend containing an alphabetical list (by last name) of each name on the privilege log identifying titles, company affiliations, the members of any group or email list on the log (e.g., the Board of Directors) and list all attorneys acting in a legal capacity with the designation ESQ after their name (include a space before and after the "ESQ"). If a claimed privilege applies to only a portion of any document, that portion only should be withheld and the remainder of the document should be produced. As used herein, "claim of privilege" includes, but is not limited to, any claim that a document either may or must be withheld from production pursuant to any law, statute, rule, policy or regulation. Produce the log and legend in electronic form that is both searchable and sortable.
6. In responding to the request, be apprised that (unless otherwise determined by the Committee) the Committee does not recognize: any purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative-process

privilege, the attorney-client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.

7. Any assertion of any such non-constitutional legal bases for withholding documents or other materials, shall be of no legal force and effect and shall not provide a justification for such withholding or refusal, unless and only to the extent that the Committee has consented to recognize the assertion as valid.
8. If any document responsive to the request was, but no longer is, in the Company's possession, custody, or control, or has been placed into the possession, custody, or control of any third party and cannot be provided in response to the request, the Company should identify the document (stating its date, author, subject and recipients) and explain the circumstances under which the document ceased to be in the Company's possession, custody, or control, or was placed in the possession, custody, or control of a third party, including, but not limited to, (a) how the document was disposed of; (b) the name, current address, and telephone number of the person who currently has possession, custody, or control over the document; (c) the date of disposition; and (d) the name, current address, and telephone number of each person who authorized said disposition or who had or has knowledge of said disposition.
9. If any document responsive to the request cannot be located, describe with particularity the efforts made to locate the document and the specific reason for its disappearance, destruction or unavailability.
10. In the event that any entity, organization, or individual named in the request has been, or is currently, known by any other name, the request should be read also to include such other names under that alternative identification.
11. All documents should be produced with Bates numbers affixed. The Bates numbers should be unique, sequential, fixed-length numbers and should begin with a prefix referencing the name of the producing party (e.g., ABCD-000001). This format should remain consistent across all productions. The number of digits in the numeric portion of the format should not change in subsequent productions, nor should spaces, hyphens, or other separators be added or deleted. All documents should be Bates-stamped sequentially and produced sequentially.
12. Documents produced in response to the request should be produced in the order in which they appear in the Company's files and should not be rearranged. Any documents that are stapled, clipped, or otherwise fastened together should not be separated. Documents produced in response to the request should be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was issued. Indicate the office or division and person from whose files each document was produced.

13. Responsive documents should be produced regardless of whether any other person or entity possesses non-identical or identical copies of the same document.
14. Produce electronic documents as created or stored electronically in their native format. Documents produced in electronic format should be organized, identified, and indexed electronically, in a manner comparable to the organization structure called for in Instruction 11 above.
15. Responsive documents should be produced in color where necessary to interpret the document.
16. Data may be produced on CD, DVD, memory stick, USB thumb drive, hard drive, or via secure file transfer. Label all media with the following:
  - a. Production date;
  - b. Bates range; and
  - c. Disk number (1 of X), as applicable.
17. If a date or other descriptive detail set forth in the request referring to a document, communication, meeting, or other event is inaccurate, but the actual date or other descriptive detail is known to the Company or is otherwise apparent from the context of the request, the Company should produce all documents which would be responsive as if the date or other descriptive detail were correct.
18. The request is continuing in nature and applies to any newly discovered document, regardless of the date of its creation. Any document not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.
19. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. Production sets shall be delivered to the Majority Staff in Room 6240 O'Neill House Office Building and the Minority Staff in Room 2142 of the Rayburn House Office Building. The Company should consult with Committee Majority Staff regarding the method of delivery prior to sending any materials.
20. If the Company's response to the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
21. Upon completion of the document production, please submit a written certification stating that: (a) a diligent search has been completed of all documents in the Company's possession, custody, or control which reasonably could contain responsive documents; (b) documents responsive to the request have not been destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee since the date of receiving the Committee's request or in anticipation of receiving the Committee's request, and (c) all documents identified during the search that are responsive have been produced to the

Committee, identified in a log provided to the Committee, or otherwise identified as provided herein.

22. A cover letter should be included with each production including the following information:
  - a. List of each piece of media (hard drive, thumb drive, DVD or CD) included in the production by the unique number assigned to it, and readily apparent on the physical media;
  - b. List of fields in the order in which they are listed in the metadata load file;
  - c. The paragraph(s) and/or clause(s) in the Committee's request to which each document responds;
  - d. Time zone in which emails were standardized during conversion (email collections only); and
  - e. Total page count and bates range for the entire production, including both hard copy and electronic documents.