

Exhibit B

Civil Action No. 1:16-cv-00595-APM

Certificate of Compliance with Provisions of the Antitrust Procedures and Penalties Act

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

IRON MOUNTAIN INC.,

and

RECALL HOLDINGS LTD.,

Defendants.

Civil Action No. 1:16-cv-00595-APM

Judge: Amit P. Mehta

**CERTIFICATE OF COMPLIANCE WITH PROVISIONS
OF THE ANTITRUST PROCEDURES AND PENALTIES ACT**

Plaintiff, United States of America, hereby certifies that it has compliance with the provisions of the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h) (“APPA”), the following procedures have been followed in preparation for the entry of the Final Judgment in this matter:

1. The Complaint, proposed Final Judgment, and Hold Separate Stipulation and Order, by which the parties have agreed to the Court’s entry of the Final Judgment, following compliance with the APPA, were filed with the Court on March 31, 2016. The United States also filed its Competitive Impact Statement with the Court on March 31, 2016;
2. Pursuant to 15 U.S.C. § 16(b), the proposed Final Judgment and Competitive Impact Statement were published in the *Federal Register* on April 11, 2016, 81 Fed. Reg. 21,383;
3. Pursuant to 15 U.S.C. § 16(c), copies of the proposed Final Judgment and Competitive Impact Statement were furnished to all persons requesting them and made available on the Department of Justice, Antitrust Division’s Internet site, as were the Complaint and Hold Separate Stipulation and Order.

4. Pursuant to 15 U.S.C. § 16(c), a summary of the terms of the proposed Final Judgment was published in *The Washington Post*, a newspaper of general circulation in the District of Columbia, for seven days beginning on April 4, 2016 and ending on April 10, 2016.
5. There were no determinative materials or documents within the meaning of 15 U.S.C. § 16(b) that were considered by the United States in formulating the proposed Final Judgment, so none was furnished to any person pursuant to 15 U.S.C. § 16(b) or listed pursuant to 15 U.S.C. § 16(c).
6. As required by 15 U.S.C. § 16(g), on April 8, 2016 and April 13, 2016, Defendants Iron Mountain Inc. and Recall Holdings Ltd., filed with the Court descriptions of written or oral communications by or on behalf of each defendant, or any other person, with any officer or employee of the United States concerning the proposed Final Judgment.
7. The sixty-day comment period prescribed by 15 U.S.C. §§ 16(b) and (d) for the receipt and consideration of written comments, during which the proposed Final Judgment could not be entered, commenced on April 11, 2016 and terminated on June 10, 2016.
8. During the comment period, the United States received one comment, dated May 31, 2016. The United States filed its response with the Court on August 29, 2016 and published the comment and response in the *Federal Register* on September 6, 2016, 81 Fed. Reg. 61,244.
9. The parties have satisfied all the requirements of the APPA, 15 U.S.C. §§ 16(b)-(h), that are conditions for entering the proposed Final Judgment. The Court may now enter the Final Judgment if the Court determines, pursuant to 15 U.S.C. § 16(e), that entry of the Final Judgment is in the public interest.

Dated: September 9, 2016.

Respectfully submitted,

/s/ Soyoung Choe

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