



Gary Wolfson Redacted@branch.io&gt;

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**Follow up requests / qq's from Legal**


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**TROWBRIDGE, ELI** Redacted@att.com>  
 To: Gary Wolfson Redacted@branch.io>  
 Cc: "MACKINNEY, LYNNE" Redacted@att.com>

Tue, Apr 28, 2020 at 5:58 PM

Thanks, Gary. This is helpful. For the second bullet the key is results *delivered in a manner* substantially similar to Google Search. "Similar to Google Search" is essentially what you've mentioned – crawling the web to find the relevant results. I think what you've mentioned is valid – Google delivers results after crawling the web whereas Branch returns app pages based on app providers sharing this data proactively with Branch. I can see how those could be two different delivery path from the information source to the end user.

I'll pass the info along. I appreciate your quick reply here.

Thanks,

Eli

**From:** Gary Wolfson Redacted@branch.io>  
**Sent:** Tuesday, April 28, 2020 5:48 PM  
**To:** TROWBRIDGE, ELI Redacted@att.com>  
**Cc:** MACKINNEY, LYNNE Redacted@att.com>  
**Subject:** Re: Follow up requests / qq's from Legal

Eli,

Below are answers to your questions.

## Redacted

- Can you please define what is referred to as "similar to Google Search"? Google search returns website results based on crawling the web whereas Branch returns app pages based on app providers sharing this data proactively with Branch. These are two, totally different use cases and markets. Branch is not a replacement for Google's search. It is an enhancement of the pre-existing on-device search that has shipped on AT&T devices since the first version of Android.
- We do not *recommend* apps to be installed. We return a relevant internal app page that matches the user query. If that app is not installed, the user is directed to go download the application to engage with that app content. There is never a recommendation, but rather matching of an app link to the user inquiry. This concept is also crucial to the ad product and how we monetize.
- (Initial question at start of email thread) Results are from mobile application content.

Regards,

**Ex. No.**  
**UPX0656**  
 1:20-cv-03010-APM



Gary

On Tue, Apr 28, 2020 at 2:17 PM TROWBRIDGE, ELI [Redacted@att.com](#)> wrote:

Hey Gary,

Hope you're doing well. Lynne and I have circled back on this topic (#1 in below string) in working with our Legal partners. They'd like us to confirm a couple more things via email:

1. From a user query in the Finder search bar, does or will Branch return search results consisting of *content from multiple apps* on that user's device?
  
2. If "yes" to #1, are these search results delivered in a manner that is substantially similar to Google Search?
  - a. If "no" to #2, how are these results *delivered* in a manner that is substantially different.
  
3. Does Branch *recommend* apps not on a user's device for the user to download?

For #1, from below email it looks like you've mentioned that results are generated from mobile application content. Are the results truly from mobile application content or from a Branch index of mobile application content?

Thanks,

Eli

**From:** Gary Wolfson [Redacted@branch.io](#)>  
**Sent:** Friday, February 21, 2020 5:10 PM  
**To:** MACKINNEY, LYNNE [Redacted@att.com](#)>  
**Cc:** TROWBRIDGE, ELI [Redacted@att.com](#)>; MURRAY, JACK [Redacted@att.com](#)>; YOUNG, CHRIS [Redacted@att.com](#)>  
**Subject:** Re: Follow up requests / qq's from Legal

Lynne,

Following up on #1:

- Confirm via email that your proposal for Branch Metrics Services would NOT infringe on our Google Search requirements, specifically the following: **that queries input into either the App Tray Finder or the search bar that's displayed when the "finder" icon on the notification screen is tapped, do not deliver search results consisting of Internet content.**



Branch's Discovery results are not delivered from Internet content. The results are generated from mobile application content

To this extent, Jack had asked the question of whether Branch overrides installed application permissions. Redacted

# Redacted

Any questions, please let me know.

Have a great weekend, enjoy the sun as we all know the rain will be back.

Gary

On Fri, Feb 14, 2020 at 3:42 PM MACKINNEY, LYNNE Redacted @att.com> wrote:

Thanks, Gary. I'll wait for your response to #1 before getting back to Jennifer.

With regard to #3, we'll stay in touch, of course, so will look for that when you have something to share.

Have a good weekend!

Lynne

**From:** Gary Wolfson Redacted @branch.io>  
**Sent:** Friday, February 14, 2020 3:18 PM  
**To:** MACKINNEY, LYNNE Redacted @att.com>  
**Cc:** TROWBRIDGE, ELI Redacted @att.com>; MURRAY, JACK Redacted @att.com>; YOUNG, CHRIS Redacted @att.com>  
**Subject:** Re: Follow up requests / qq's from Legal

Lynne,

Thanks for the feedback.

Let me circle back internally specifically related to Point #1 for an official response and confirmation as that statement appears to be correct based on my understanding.

As for Point #2, Redacted

# Redacted



- For example, TNT has a Captain America article on their website with a link to the movie. A user clicks on the link in the article expecting to view the movie
- TNT as the developer can decide if the user does not have the application should they be taken to their website or to the app store to download the TNT app
- If they download the app, then the user would be taken to Captain American movie on first use of the application once they have agreed to the necessary legalese

# Redacted

As for Point #3 and the contract, we continue to work on the carrier agreement which as you can guess is taking longer than expected. Hope to have something to share in a week or two.

Regards,

Gary

On Fri, Feb 14, 2020 at 2:58 PM MACKINNEY, LYNNE [Redacted@att.com](mailto:Redacted@att.com) wrote:

Hi Gary,

We are continuing to work with our Legal and Privacy partners so that we can move forward with our discussions. As part of those efforts, Legal has asked the following:

1. Confirm via email that your proposal for Branch Metrics Services would NOT infringe on our Google Search requirements, specifically the following: **that queries input into either the App Tray Finder or the search bar that's displayed when the "finder" icon on the notification screen is tapped, do not deliver search results consisting of Internet content.**
2. Elaborate on a statement on Slide 6 of the deck you shared with us that talks about "Fallback to Website"? **What exactly does this statement mean, and when would this "fallback" occur?**
3. Provide a contract template for the agreement that you have in mind.

Thanks!

Lynne

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Lynne MacKinney

Consumer Security & Strategic Partnerships

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**Gary Wolfson**

Director, Discovery Partnerships

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