

1 **STIPULATION**

2 The parties to this stipulation, Plaintiff STATE OF WASHINGTON (STATE) and
3 Defendant TWITTER, INC. (TWITTER), desiring to resolve all claims arising out of the State’s
4 Complaint, hereby enter into the following stipulation:

5 1. Defendant TWITTER agrees to pay to the STATE the amount of \$100,000.00,
6 inclusive of the State’s reasonable costs of investigation and trial, including its reasonable
7 attorneys’ fees, for Defendant TWITTER’s violations of RCW 42.17A.345 and WAC 390-18-
8 050 as alleged in the State’s Complaint and up to the date of this stipulation. This payment fully
9 resolves Twitter’s liability under RCW 42.17A.345 and WAC 390-18-050 with respect to any
10 and all political advertisements posted to Twitter up to November 22, 2019. By entering into this
11 stipulation, TWITTER does not waive for future consideration its contention that
12 RCW 42.17A.345 and WAC 390-18-050 are preempted by federal law as applied to Twitter.

13 2. Defendant TWITTER agrees to pay this \$100,000.00 amount by wire transfer,
14 pursuant to instructions that will be provided by the State, or by check made payable to the
15 Washington State Treasurer and sent to the **Public Disclosure Commission, PO Box 40908,**
16 **Olympia, WA 98504-0908** within 30 days from the date of the entry of this Judgment.

17 DATED this 9th day of October 2020.

18 ROBERT W. FERGUSON
19 Attorney General

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21 S. TODD SIPE, WSBA #23203
22 Assistant Attorney General
23 *Attorney for Plaintiff State of Washington*

PERKINS COIE LLP

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25 DAVID A. PEREZ, WSBA #43959
26 *Attorney for Defendant Twitter, Inc.*

JUDGMENT

The Court, having reviewed the records and files herein, and having found the settlement to be a just and proper resolution of this matter, and being otherwise fully advised in the premises, hereby ORDERS as follows:

1. The State of Washington is awarded judgment against Defendant TWITTER in the amount of \$100,000.00, inclusive of the State’s reasonable costs of investigation and trial, including its reasonable attorneys’ fees.

2. No interest shall accrue if Defendant TWITTER pays the State this \$100,000.00 amount by wire transfer or by check made payable to the Washington State Treasurer within 30 days from the date of the entry of this Judgment.

DONE IN OPEN COURT this ____ day of _____ 2020.

JUDGE/COMMISSIONER

PRESENTED BY:

ROBERT W. FERGUSON
Attorney General



S. TODD SIPE, WSBA #23203
Assistant Attorney General
Attorney for Plaintiff State of Washington

And:

PERKINS COIE LLP



DAVID A. PEREZ, WSBA #43959
Attorney for Defendant Twitter, Inc.

King County Superior Court
Judicial Electronic Signature Page

Case Number: 20-2-15134-3
Case Title: STATE OF WASHINGTON vs TWITTER
Document Title: Order

Signed By: Bradford Moore
Date: October 12, 2020



Judge/Commissioner: Bradford Moore

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: FC8744E49A72FF0F850BE061D5A0A1A293B475BB
Certificate effective date: 5/22/2017 2:57:35 PM
Certificate expiry date: 5/22/2022 2:57:35 PM
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=kcdja, O=kcdja,
CN="Brad Moore: kHmbWor95BGfWFJmHl1GsA=="