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BIG TECH V. GLOBAL ANTITRUST AUTHORITIES - INSIGHTS FROM US/EU

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UNITED STATES: POLICY

Biden Administration Executive Order on Competition

- Executive Order 14036
 - Issued by Biden on July 9, 2021
 - Orders “whole of government” approach to promoting competition
- Orders DOJ and FTC to utilize
- Particular focus on digital markets
 - “The American information technology sector has long been an engine of innovation and growth, but today a small number of dominant internet platforms use their power to exclude market entrants, to extract market profits, and to gather intimate personal information they can exploit to their own advantage.”



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Title 3—
The President

Presidential Documents

36987

Executive Order 14036 of July 9, 2021
Promoting Competition in the American Economy

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to promote the interests of American workers, businesses, and consumers, it is hereby ordered as follows:

Section 1. Policy. A fair, open, and competitive marketplace has long been a cornerstone of the American economy, while excessive market concentration threatens basic economic liberties, democratic accountability, and the welfare of workers, farmers, small businesses, startups, and consumers.

The American promise of a broad and sustained prosperity depends on an open and competitive economy. For workers, a competitive marketplace creates more high-quality jobs and the economic freedom to switch jobs or negotiate a higher wage. For small businesses and farmers, it creates more choices among suppliers and major buyers, leading to more take-home income, which they can reinvest in their enterprises. For entrepreneurs, it provides space to experiment, innovate, and pursue the new ideas that have for centuries powered the American economy and improved our quality of life. And for consumers, it means more choices, better service, and lower prices.

Robust competition is critical to preserving America's role as the world's leading economy.

Yet over the last several decades, as industries have consolidated, competition has weakened in too many markets, denying Americans the benefits of an open economy and widening racial, income, and wealth inequality. Federal Government inaction has contributed to these problems, with workers, farmers, small businesses, and consumers paying the price.

Consolidation has increased the power of corporate employers, making it harder for workers to bargain for higher wages and better work conditions. Powerful companies require workers to sign non-compete agreements that restrict their ability to change jobs. And, while many occupational licenses are critical to increasing wages for workers and especially workers of color, some overly restrictive occupational licensing requirements can impede workers' ability to find jobs and to move between States.

Consolidation in the agricultural industry is making it too hard for small family farms to survive. Farmers are squeezed between concentrated market power in the agricultural input industries—seed, fertilizer, food, and equipment suppliers—and concentrated market power in the channels for selling agricultural products. As a result, farmers' share of the value of their agricultural products has decreased, and poultry farmers, hog farmers, cattle ranchers, and other agricultural workers struggle to retain autonomy and to make sustainable returns.

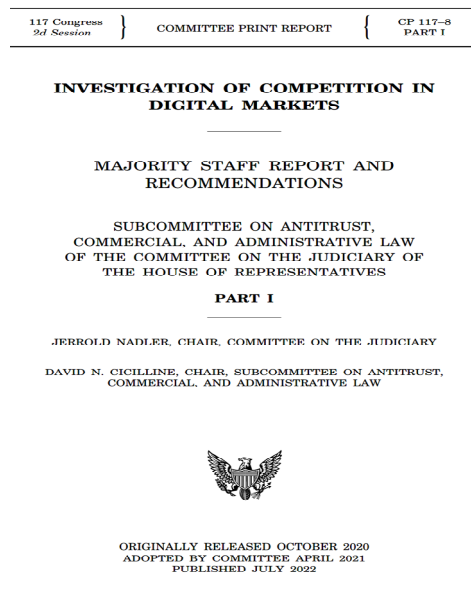
The American information technology sector has long been an engine of innovation and growth, but today a small number of dominant internet platforms use their power to exclude market entrants, to extract monopoly profits, and to gather intimate personal information that they can exploit for their own advantage. Too many small businesses across the economy depend on those platforms and a few online marketplaces for their survival. And too many local newspapers have shuttered or downsized, in part due to the internet platforms' dominance in advertising markets.

Agency Policy Statements: FTC and DOJ

- New leadership at FTC and DOJ
 - FTC Chair Lina Khan
 - Rose to prominence as law student for article challenging dominant standards for assessing antitrust violations, particularly as they relate to tech platforms (“Amazon’s Antitrust Paradox”)
 - Advocated move away from “consumer welfare” standard
 - AAG Jonathan Kanter
 - Long a critic of tech platforms
 - “Competitive Process” standard, instead of consumer welfare standard

Congressional Focus on Competition in Digital Markets

- Investigation of competition in digital markets commissioned by Congress in 2020
- Issued report: July, 2022
 - Concern about durable market power in digital platform markets
 - Lax antitrust enforcement has enabled development of market power
 - Effects of market power on democratic outcomes
- Lina Khan (current Chair of FTC) the principal counsel to committee in preparing report



Pending Legislation: American Innovation and Choice Online Act (S. 2992)

- Would prohibit large “online platforms” from
 - Self-preferencing their products or lines of business
 - Discriminating against other competitors on platform
 - Conditioning access to platform on purchase or use of other products
 - Using non-public data of other platform users for platform’s products
- Online platform is “website, online or mobile application, operating system, digital assistant, or online service” that (A) enables a user to generate or interact with content on the platform, (B) facilitates e-commerce among consumers or third-party businesses, or (C) enables user searches that display a large volume of information.
- “Covered Platforms”:
 - at least 50 million monthly active users (or 100,000 business users)
 - annual market capitalization or U.S. net sales exceeding \$550 billion, AND
 - that serve as a “critical trading partner” for its business users



II

Calendar No. 301

117TH CONGRESS
2D SESSION

S. 2992

To provide that certain discriminatory conduct by covered platforms shall be unlawful, and for other purposes.

IN THE SENATE OF THE UNITED STATES

OCTOBER 18, 2021

Ms. KLOBUCHAR (for herself, Mr. GRASSLEY, Mr. DUBBIN, Mr. GRAHAM, Mr. BLUMENTHAL, Mr. KENNEDY, Mr. BOOKER, Ms. LUMMIS, Ms. HIRONO, Mr. WARNER, Mr. HAWLEY, and Mr. DAINES) introduced the following bill, which was read twice and referred to the Committee on the Judiciary

MARCH 2, 2022

Reported by Mr. DUBBIN, with an amendment

(Strike out all after the enacting clause and insert the part printed in italic)

Pending Legislation: Open App Markets Act (S. 2710)

- Would prohibit “covered companies” from requiring use of their payment systems to make apps available through their app stores
- Would essentially require “covered companies” to allow side loading of apps
- Would require that “covered companies” allow users to delete or hide pre-installed apps
- Would prohibit “covered companies” from using data from apps used on their platform to compete
- “Covered companies”= 50,000,000 U.S.-based users



ii

Calendar No. 275

117TH CONGRESS
2D SESSION

S. 2710

To promote competition and reduce gatekeeper power in the app economy,
increase choice, improve quality, and reduce costs for consumers.

IN THE SENATE OF THE UNITED STATES

AUGUST 11 (legislative day, AUGUST 10), 2021

Mr. BLUMENTHAL (for himself, Mrs. BLAUGHER, Ms. KLOBUCHAR, Mr. RUBIO, Ms. LUMMIS, Mr. BOOKER, Mr. GRAHAM, Mr. KENNEDY, Mr. HIRONO, Mr. HAWLEY, and Mr. DURBIN) introduced the following bill, which was read twice and referred to the Committee on the Judiciary

FEBRUARY 17, 2022

Reported by Mr. DURBIN, with an amendment

(Strike out all after the enacting clause and insert the part printed in *italics*)

A BILL

To promote competition and reduce gatekeeper power in the app economy, increase choice, improve quality, and reduce costs for consumers.

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UNITED STATES: ENFORCEMENT

Pending Litigation: Monopolization Cases

- United States v. Google (Google I) (2020):
 - Alleges monopolization of search and search advertising by:
 - Entering into exclusivity agreements that forbid preinstallation of any competing search service.
 - Entering into tying and other arrangements that force preinstallation of its search applications in prime locations on mobile devices and make them undeletable, regardless of consumer preference.
 - Entering into long-term agreements with Apple that require Google to be the default – and *de facto* exclusive – general search engine on Apple’s popular Safari browser and other Apple search tools.
 - Generally using monopoly profits to buy preferential treatment for its search engine on devices, web browsers, and other search access points, creating a continuous and self-reinforcing cycle of monopolization.
- Trial scheduled in DC for 4Q 2023

Pending Litigation: Monopolization Cases

- United States v. Google (Google II) (2023):
 - Alleges monopolization of advertising tech
 - Claims that acquisitions (generally reviewed in past by DOJ) enabled development of market power
 - Claims that market power at different levels of “ad tech stack” leads to durable market power
 - Follows on complaints filed by States
- Texas + Various States v. Google (2022)
 - Alleges that app store policies requiring use of Google payment services violates the Sherman Act
 - Follows on private cases seeking damages for those policies
 - Trial in San Francisco scheduled for 4Q 2023

Pending Litigation: Monopolization Cases

- FTC v. Meta Industries (2020)
 - Alleges that Facebook monopolized social media markets
 - Challenges (previously approved) acquisitions of Instagram and WhatsApp
 - Alleges discriminatory access to Facebook APIs to disadvantage competitors
 - Case proceeding in DC

Merger Enforcement

- FTC v. Meta/Within (2022)
 - FTC sued to prevent Meta's acquisition of Within, a manufacturer of VR fitness apps
 - Meta did not offer a competing product
 - FTC pursued "potential competition" theory
 - Preliminary injunction denied (2023); and FTC dropped case
- FTC v. Microsoft/Activision (2022)
 - FTC has brought administrative complaint to stop Microsoft's acquisition of Activision
 - Vertical theory: alleges Microsoft will use Activision game library to disadvantage other console competitors and cloud gaming services
 - Hearing scheduled for August, 2023

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EUROPEAN UNION: POLICY/REGULATION

EU: Digital Markets Act

The Digital Markets Act (“**DMA**”) entered into force on 1 November 2022. The DMA regulates the business conduct of digital “gatekeepers” in relation to one or more “Core Platform Services” (“**CPS**”). The DMA establishes a narrowly defined objective criteria for designation of a digital platform as a “gatekeeper”. Companies will need to notify the European Commission (“**EC**”) if they meet the threshold within **two months**.

Gatekeepers

A size that impacts the internal market: this is presumed if the firm has an annual turnover in the EU of €7.5 billion or more in each of the last three financial years **or** its average market capitalization/market value is at least €75 billion in the last financial year. In addition, it must provide the same core platform service in at least three Member States; **and**

The control of an important gateway for business users towards final consumers: this is presumed if the firm provides a core platform service that had an average of at least 45 million monthly active end-users and at least 10,000 yearly active business users established or located in the EU in the last financial year; **and**

An entrenched and durable position: this is presumed if each of these thresholds was satisfied in each of the previous three financial years.

Core Platform Services

- ✓ online intermediation services
- ✓ online search engines
- ✓ video sharing platform service
- ✓ number-independent interpersonal electronic communication services
- ✓ operating systems
- ✓ web browsers
- ✓ virtual assistants
- ✓ cloud computing services; and
- ✓ online advertising services including any advertising networks, advertising exchanges and any other advertising intermediation services provided by an undertaking providing any of the core platform services listed.

EU: Digital Markets Act – obligations on gatekeepers

The new rules under the DMA establish **obligations** that gatekeepers must comply with in their daily operations.

These obligations include among other things allowing:

- ✓ end users to easily un-install pre-installed apps or change default settings on operating systems, virtual assistants or web browsers that steer them to the products and services of the gatekeeper and provide choice screens for key services;
- ✓ end users to install third party apps or app stores that use or interoperate with the operating system of the gatekeeper;
- ✓ end users to unsubscribe from core platform services of the gatekeeper as easily as they subscribe to them;
- ✓ third parties to inter-operate with the gatekeeper's own services;
- ✓ companies to advertise on their platform with access to the performance measuring tools of the gatekeeper and the information necessary for advertisers and publishers to carry out their own independent verification of their advertisements hosted by the gatekeeper;
- ✓ business users to promote their offers and conclude contracts with their customers outside of the gatekeeper's platform;
- ✓ business users access to the data generated by their activities on the gatekeeper's platform.

EU: Digital Markets Act: prohibitions on gatekeepers

The DMA also introduces a number of **prohibitions** on gatekeepers, largely derived from previous competition cases at the EC.

These include bans on:

- x using the data of business users when gatekeepers compete with them on their own platform;
- x ranking the gatekeeper's own products or services in a more favourable manner compared to those of third parties;
- x requiring app developers to use certain of the gatekeeper's services (such as payment systems or identity providers) in order to appear in app stores of the gatekeeper;
- x tracking end users outside of the gatekeepers' core platform service for the purpose of targeted advertising, without effective consent having been granted.

EU: Digital Markets Act: enforcement

The EC is the sole enforcer of the DMA, in close cooperation with the authorities in EU member states.

- The DMA provides that national competition authorities can investigate violations of the DMA substantive provisions, as long as they are empowered to do so by their national laws. **EU Member States are introducing legislation** or proposing amendments in their national Competition Acts conferring powers to apply the DMA. So far, these include Hungary, The Netherlands, Greece, Luxemburg and Germany.
- In Germany, the proposed draft states that the German Competition Authority, the Bundeskartellamt may “publish a report on the results of the investigation”. It remains to be seen how this pre-decision decision may compete with any decision from the EC.
- National Competition Authorities (“**NCA**s”) have no power to sanction gatekeepers for violations of the DMA.
- Individuals can provide NCAs with information about alleged DMA infringements, with the possibility for NCAs to conduct their own analysis of such claims and to inform the EC where they consider them to be credible.

The EC will be able to impose **fines** for non-compliance with the rules of up to 10% of the company's total worldwide annual turnover or 20% in the event of repeated infringements and periodic penalty payments of up to 5% of the company's total worldwide daily turnover.

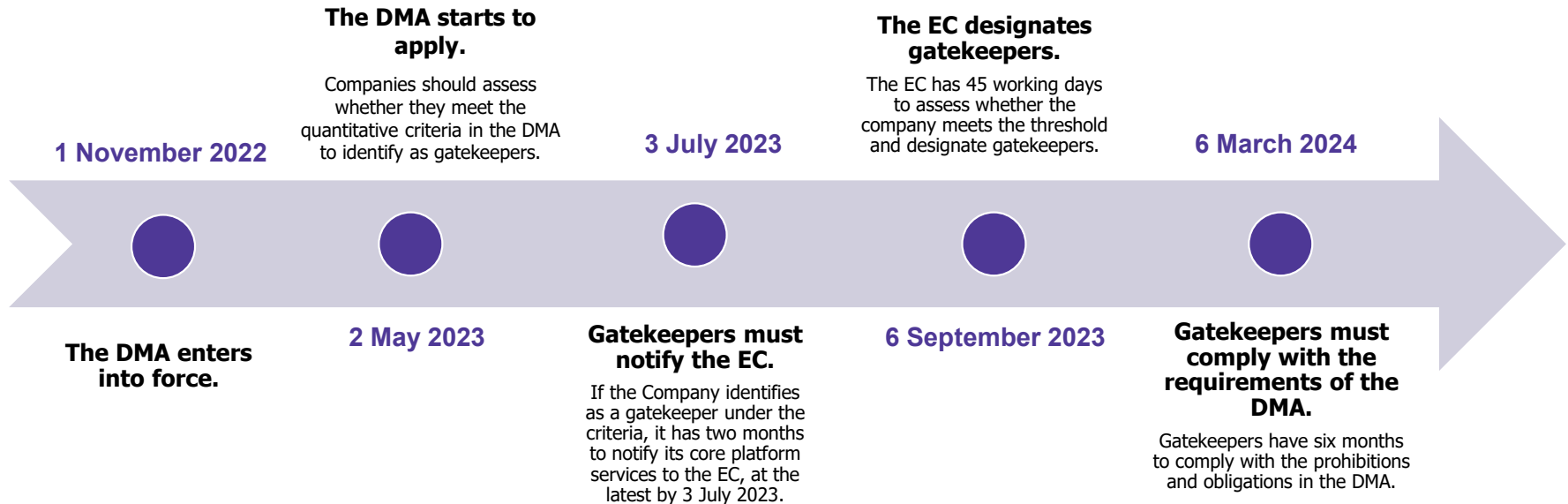
- for systematic infringements, the EC can impose **behavioural or structural remedies**.
- remedies may include obliging a gatekeeper to sell a business, or parts of it (i.e. selling units, assets, intellectual property rights or brands), or banning a gatekeeper from acquiring any company that provides services in the digital sector or services enabling the collection of data affected by the systematic non-compliance.

EU: Digital Markets Act: obligations to report acquisitions

Article 14 DMA – mandatory reporting obligations of gatekeepers

- Under the Article 14 DMA, all gatekeepers must inform the EC of any intended acquisition, irrespective of whether it would be notifiable to the EC under EU Merger Regulation.
- The DMA works together with Article 22 of EU Merger Regulation. Under Article 22, EU Member States may refer mergers to the EC for review, even if this merger falls below national or EU merger control thresholds.
- DMA Article 14 and Article 22 of EU Merger Regulation enable the EC to better monitor developments in digital markets and review problematic mergers which would have otherwise fallen below the thresholds.

EU: Digital Markets Act: next steps



The Digital Services Act

- The DSA applies to (i) online intermediary services such as internet providers, (ii) hosted service providers, and (iii) online platform providers such as online marketplaces, app stores, and social media platforms. It applies to such entities that offer their services within the European Union, regardless of whether they are established inside or outside the European Union.
- The obligations of the DSA increase depending on the size of the organization, but the fundamental principles of transparency and accountability will apply to all organizations under the scope of the DSA. The European Union has adopted this approach to ensure that small to medium-size businesses are not adversely affected by costs of compliance.
- As businesses grow and are required to comply with more of the DSA's obligations, they will be allowed a 12-month grace period in order to achieve compliance.
- Some key provisions in the DSA are as follows:
 - Measures to counter illegal goods, services, or content online, including an ability for users to flag such content
 - Transparency requirements, including in relation to algorithms used to recommend content or products
 - A requirement for very large platforms to undertake independent audits of risk management systems
 - Bans on targeted advertisements to children and those based on special characteristics of users
 - Rights for users to challenge a platform's content moderation decisions and seek redress, either via an out-of-court dispute mechanism or judicial redress

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UNITED KINGDOM: POLICY/REGULATION

UK: a new pro-competition regime for digital markets

The UK Government has proposed a new “**pro-competition regime for digital markets**” in 2021, targeting a number of firms designated as having “Strategic Market Status” (SMS) in relation to specific digital activities. The new regime is currently anticipated to come into force by the **end of 2023**.

The **Digital Markets Unit (“DMU”)** will enforce the new regime. The DMU is currently operating without express statutory powers within the UK Competition and Markets Authority (“**CMA**”) pending the new legislation. The DMU’s core objective will be to promote competition in digital markets for the benefit of consumers.

The DMU will be empowered to:

- designate companies as being an SMS firm, meaning substantial and entrenched market power in at least one digital activity;
- require SMS designated firms to comply with a firm-specific code of conduct;
- impose (subject to judicial review) remedies/ penalties for breaches (including **financial penalties of up to 10%** of a firm’s global turnover to **disqualify individuals** from holding company directorships, criminal penalties and **interim orders**);
- impose targeted “pro competitive interventions” to remedy adverse effects on competition;
- SMS designated firms will also be subject to a new mandatory reporting scheme.

UK: Digital Markets Unit

The DMU will set and enforce a code of conduct as well as implementing pro-competitive interventions like access to data and interoperability, to open up greater opportunities for competition and innovation.

Code of Conduct

- The DMU will create **tailored, binding conduct requirements** for SMS firms.
- The categories of conduct requirements will be set out in the legislation, e.g. requiring SMS firms **not to apply discriminatory terms, preventing bundling or tying**; and providing clear, relevant, accurate and accessible **information to users**. These may be subject to certain exemptions.

Pro-competitive interventions

- Where there is an adverse effect on competition resulting from entrenched power in digital markets, the DMU may be able to impose pro-competitive interventions (“**PCIs**”) for example **data-related interventions, interoperability** and common standards, **consumer choice** and defaults interventions, obligations to provide **access on fair and reasonable terms**.
- The DMU will be empowered to run its own investigations and implement the appropriate remedies.

UK: Digital Markets Unit – Changes to Merger Control Rules

The SMS regime focuses on ensuring the CMA has visibility over transactions carried out by SMS designated firms.

SMS designated firms will be subject to mandatory reporting requirements for their most **significant transactions** to the CMA.

The most significant transactions will be where:

- the SMS firm acquires over a **15% equity or voting share** after the transaction;
- the value of the SMS firm's holding is **over £25m**; and
- the transaction meets a **UK nexus test** (established by conditions such as the target business having assets, revenues, employees or legal presence in the UK).

The CMA will undertake an initial assessment of the transaction and can then request further information and/or launch a merger investigation. This reduces the risk of over-enforcement, particularly where digital platforms are already facing increased merger control scrutiny.

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EU/UK: ENFORCEMENT

Ongoing Investigations: EC/CMA

- **Apple** – App Store practices (2020)
 - The EC is concerned that the anti-steering obligations imposed by Apple on music streaming app developers prevent those developers from informing consumers about where and how to subscribe to streaming services at lower prices. The EC alleges that these anti-steering obligations:
 - (i) are **neither necessary nor proportionate** for the provision of the App Store on iPhones and iPads;
 - (ii) are **detrimental** to users of music streaming services on Apple's mobile devices who may end up paying more;
 - (iii) **negatively affect** the interests of music streaming app developers by limiting effective consumer choice.
 - The UK's CMA has launched a similar investigation into Apple's conduct in relation to the distribution of apps on iOS and iPadOS devices in the UK, with a steer expected May 2023. The CMA is also investigating Google's distribution of apps on its Play Store.
 - There is no legal deadline for bringing an antitrust investigation to an end.
- **Apple** – Apple Pay (2020)
 - The EC considers that Apple enjoys significant market power in the market for smart mobile devices and a dominant position on mobile wallet markets.
 - The EC's preliminary position is that Apple's dominant position in the market for mobile wallets on its operating system iOS restricts competition by reserving access to near-field communication technology to Apple Pay.

Ongoing Investigations: EC/CMA

- **Amazon** – Marketplace (2019) and Buy Box (2020)
 - The EC preliminarily found Amazon dominant on the French and German markets, for the provision of online marketplace services to third-party sellers.
 - The EC also found that that Amazon's reliance on marketplace sellers' non-public business data to calibrate its retail decisions distorted fair competition on its platform and prevented effective competition.
 - The EC opened a second investigation to assess whether the criteria that Amazon sets to select the winner of the Buy Box and to enable sellers to offer products under its Prime Programme led to preferential treatment of Amazon's retail business or of the sellers that use Amazon's logistics and delivery services.
 - December 2022: the EC accepted commitments by Amazon which will end the two EU antitrust probes. The commitments bar Amazon from using marketplace seller data and it must ensure equal access to Buy Box and Prime.
 - Amazon has six months to make the changes and will be required to appoint a monitoring trustee by late April.
 - If Amazon breaches its promises, it can be fined up to 10 percent of total annual revenue.
- The UK's CMA initiated its own investigation into Amazon's Marketplace in 2022 which is still ongoing.
 - The CMA's investigation focuses on the way that non-public third-party seller data may be used within Amazon's retail business, how Amazon sets criteria selecting which product offer is placed within the Buy Box and which sellers can list products under Amazon's Prime label on its Marketplace in the UK.

Ongoing Investigations: EC/CMA

- **Meta** – Facebook Marketplace (2021)
 - In December 2022, the EC informed Meta of its preliminary view that the company breached EU antitrust rules by distorting competition in the markets for online classified ads.
 - The EC is also concerned with:
 - Meta tying its online classified ads service, Facebook Marketplace, to its personal social network, Facebook; and
 - Meta imposing unfair trading conditions on Facebook Marketplace's competitors for its own benefit.
 - If confirmed, these practices would infringe Article 102 of the Treaty on the Functioning of the European Union ('TFEU') that prohibits the abuse of a dominant market position.
 - In the UK, the CMA opened a similar investigation in 2021 into whether Meta might be abusing a dominant position in the social media or digital advertising markets through its collection and use of advertising and single sign-on data.
 - The CMA estimates it will complete its further analysis by Summer 2023.

Ongoing Investigations: EC/CMA

- **Google – Ad Tech (2022)**
 - The EC initiated formal antitrust proceedings against Google and Alphabet on 21 June 2021.
 - The EC will investigate whether Google has violated EU competition rules by favouring its own online display advertising technology services in the “ad tech” supply chain, to the detriment of competing providers of advertising technology services, advertisers and online publishers.
 - On 25 May 2022, the CMA launched a similar investigation into suspected breaches of competition law by Google.
 - The CMA is assessing whether Google’s practices in parts of the ad tech stack may distort competition. These include:
 - Whether Google limited the interoperability of its ad exchange with third-party publisher ad servers and/or contractually tied these services together, making it more difficult for rival ad servers to compete; and
 - Whether Google may have used its publisher ad server and its DSPs to illegally favour its own ad exchange services, while taking steps to exclude the services offered by rivals.
 - The CMA will combine this with a separate investigation into whether Google might have abused a dominant position through its conduct in relation to header bidding services.
 - The EC dropped its own antitrust investigation into Google’s header bidding services in December 2022.
 - The CMA’s analysis is expected early 2024.

Merger Enforcement

- MFST/Activision (2022)

The EC and the CMA are both currently investigating Microsoft's proposed acquisition of Activision Blizzard (the "**Transaction**") a large video games developer and publisher, with franchises including Call of Duty ("**CoD**") and World of Warcraft ("**WoW**").

- at Phase 1, the EC and the CMA found that the Transaction would result in a substantial lessening of competition in: (a) Microsoft withholding or degrading Activision's content—including popular games such as CoD—from other consoles or multi-game subscription services; and (b) Microsoft leveraging its broader ecosystem together with Activision's game catalogue to strengthen network effects, raise barriers to entry and ultimately foreclose rivals in cloud gaming services.
- at Phase 2, after oral hearings with the parties, both the EC and the CMA revised their original findings to focus on remedies for cloud gaming.

Microsoft will have to persuade the CMA that the relevant customer benefits it will produce post-Transaction, such as offering Activision games on cloud where none were previously, are substantial enough to outweigh the CMA's concerns. It has been reported that the EC is currently market-testing the same remedy on cloud gaming that Microsoft has offered to the CMA.

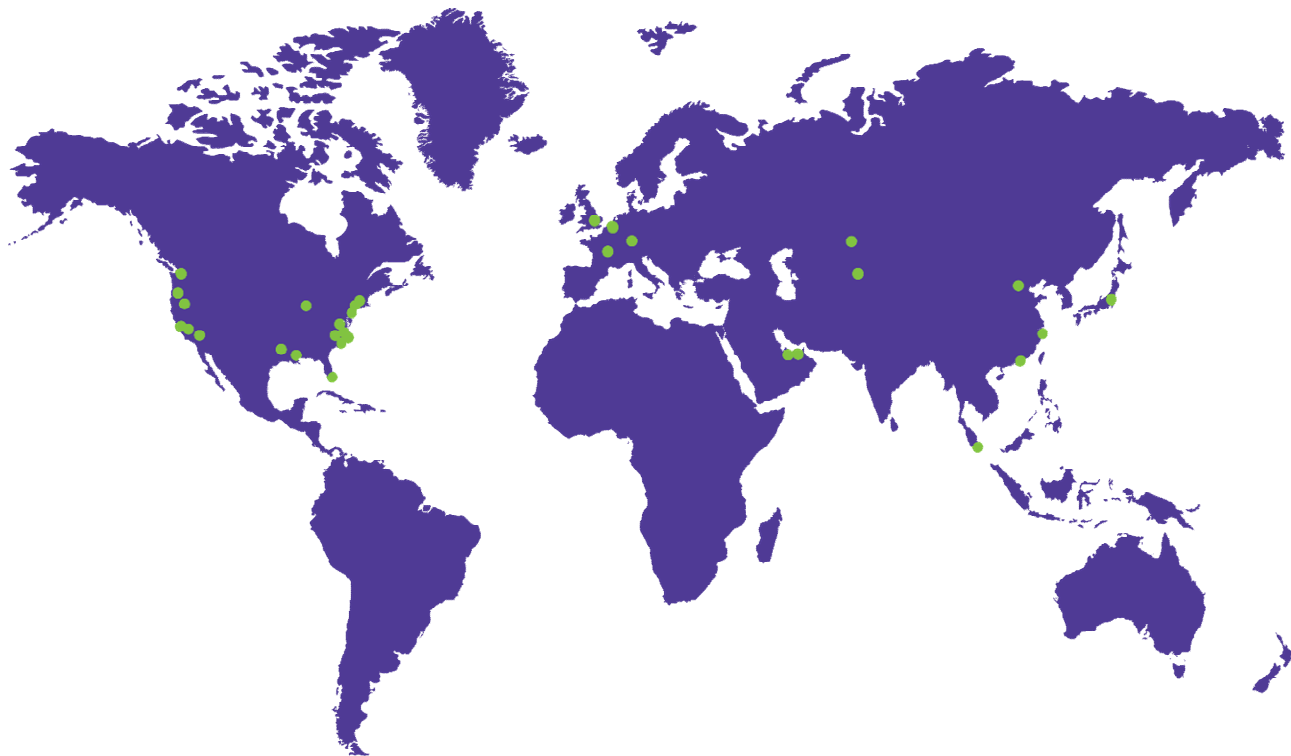
- Phase 2 Decision is scheduled for 26 April 2023 (CMA) and 22 May 2023 (EC).

Our Global Reach

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Our Locations

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