

# Kristen C. Limarzi

Partner

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Washington, D.C.

Kristen Limarzi is a partner in the highly acclaimed Antitrust and Competition Practice Group of Gibson, Dunn & Crutcher, based in Washington, D.C. Prior to joining the firm, she served as a top enforcement official in the U.S. Department of Justice's Antitrust Division, where, as Section Chief, she helped shape and implement the agency's enforcement priorities and policies for both mergers and other business practices across industries.

Recognized as "Dealmaker of the Year" for 2023 by *Global Competition Review*, Kristen leverages her experience as a top government enforcer to represent clients in merger and non-merger investigations before the DOJ, the Federal Trade Commission, and foreign antitrust enforcers, as well in as appellate and civil litigation. Her experience in merger matters spans the gamut of sectors, including consumer products, healthcare, oil and gas, telecommunications, financial and other data services, transportation, and high-tech products. Kristen brings a practical approach to helping clients navigate the increasingly complex antitrust enforcement environment, employing her deep experience with agency practice to achieve successful results in an efficient manner.

Since joining Gibson Dunn, Kristen has represented:

- **VMware** in securing global antitrust clearance of its \$61 billion acquisition by Broadcom;
- **Xylem** in its acquisition of Evoqua;
- **NewsCorp.'s Dow Jones** subsidiary in its billion-dollar acquisition of assets from S&P Global and IHS Markit, proposed by the latter in connection with DOJ and foreign enforcers' review of their global merger;
- **Hershey Co.** in its acquisitions of chocolate manufacturer Lily's and pretzel maker Dots;
- **General Electric** in its acquisition of BK Medical;
- **Welbilt** in its proposed acquisition by Middleby and then in the successful topping bid acquisition by Ali Group;
- **Hologic** in its acquisitions of Biotheranostics and Bolder Surgical;

Kristen's antitrust litigation experience also includes representing:

- **Marriott** in defending class actions alleging information exchanges;
- **Hill-Rom** in defending a monopolization claim brought by a competitor;
- **A major European financial institution** in defending class actions alleging price fixing in European Government Bonds;
- **AT&T**, as a non-party, in the DOJ's investigations and lawsuits against Google.

Kristen has also served as a corporate compliance monitor, overseeing the adoption of rigorous competition-related controls at a corporation subject to a non-prosecution agreement with the Antitrust Division.



## Capabilities

Antitrust and Competition  
Appellate and Constitutional Law  
Litigation

## Credentials

### Education

Georgetown University - 2002 Juris Doctor  
Swarthmore College - 1997 Bachelor of Arts

### Admissions

District of Columbia Bar

### Clerkships

USDC, Eastern District of Virginia, Rt. Hon. Leonie Brinkema, 2002 - 2003

Prior to joining Gibson Dunn, Kristen twice received the U.S. Attorney General's Distinguished Service Award. As DOJ Antitrust Division Appellate Section Chief, she was responsible for a team of more than a dozen professionals litigating appeals in the Division's civil and criminal enforcement actions and participating as amicus curiae in private antitrust actions. While serving in the Antitrust Division, Kristen also helped to develop Division policies on a wide range of issues. She was a principal drafter of the agency's *Antitrust Guidance for Human Resources Professionals* in 2016, and she led the team revising the agency's *Antitrust Guidelines for International Enforcement and Cooperation* in 2017.

In recognition of her expertise in merger matters and competition policy, she was also a member of the small team of attorneys and economists from the Antitrust Division and the Federal Trade Commission that revised the *Horizontal Merger Guidelines* in 2010. Her litigation experience as a government enforcer included appeals of merger challenges in *United States v. AT&T* and *United States v. Anthem*.

Kristen is senior fellow in George Washington University's Competition and Innovation Lab, and speaks regularly on antitrust issues, including at programs for the U.S. Department of Justice, the American Bar Association, George Mason University, and the Association of American Law Schools.

She clerked for Judge Leonie M. Brinkema of the U.S. District Court for the Eastern District of Virginia from 2002 to 2003. She received her law degree, *magna cum laude*, in 2002 from Georgetown University Law Center, where she was elected to the Order of the Coif. Kristen earned a Bachelor of Arts degree with high honors from Swarthmore College in 1997.

Kristen is admitted to practice in the District of Columbia.

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