Kristen C. Limarzi

Partner

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Kristen Limarzi is a partner in the Washington, D.C. office of Gibson Dunn and Global Co-Chair of the firm's Antitrust and Competition Practice Group. 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.

Kristen leverages her experience as a top government enforcer to represent clients in complex merger and non-merger investigations before the U.S. Department of Justice, the Federal Trade Commission, and international competition authorities, as well as in high-stakes appellate and civil litigation matters. In 2023, Kristen was honored as *Global Competition Review's* "Dealmaker of the Year." She has also been named a leading antitrust practitioner by *Chambers USA*, featured as one of *Lawdragon*'s "500 Leading Antitrust and Competition Lawyers" (2025-2026), and recognized in *Global Competition Review*'s Women in Antitrust (2025). Kristen is described by *Chambers* as a "very practical" and "excellent go-to advocate." She brings this 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; and
- **Hologic** in its acquisitions of Endomag, Biotheranostics and Bolder Surgical.

Kristen's antitrust litigation experience 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

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

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fixing in European Government Bonds; and

- **AT&T**, as a non-party, in the DOJ's investigations and lawsuits against Google.

Kristen brings exceptional experience and a practical approach to representing companies in non-public civil and criminal antitrust investigations. She 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.

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, she led the team revising the agency's *Antitrust Guidelines for International Enforcement and Cooperation* in 2017 and was part of the small team of agency attorneys and economists that revised the *Horizontal Merger Guidelines* in 2010.

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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