THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, et al.,

Plaintiffs,

v.

AMAZON.COM INC., a corporation,

Defendant.

Case No. 2:23-cv-01495-JHC

**AMAZON'S MOTION FOR LEAVE TO FILE OVER-LENGTH BRIEF RE: FORTHCOMING OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS RELATED TO SPOLIATION**

NOTE ON MOTION CALENDAR:
May 8, 2024

Pursuant to Local Rule 7(f), Amazon.com, Inc. seeks leave of the Court to file an over-length brief opposing Plaintiffs' Motion To Compel Production Of Documents Related To Spoliation (ECF No. 198) ("Motion"). Amazon anticipates that it will file a response of no more than 5,000 words, which is 800 words more than the 4,200 word limit prescribed by Local Rule 7(e)(4).

The requested extension would aid the Court's consideration of Plaintiffs' Motion for two principal reasons. First, Plaintiffs' Motion describes events dating back to 2019, both before and during the pre-complaint investigation that spanned several years, and attaches 19 exhibits, many of which are lengthy and detailed. This word extension would allow Amazon to provide the Court



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with an accurate recounting and timeline of the events underlying Plaintiffs' motion. Second, Plaintiffs' motion seeks the extreme remedy of ordering Amazon to produce in discovery materials that are protected by the attorney-client privilege. The word extension is necessary for Amazon to set out the legal and factual bases why the Court should protect the attorney-client privilege and deny Plaintiffs' motion to compel.

Even with this modest request, Plaintiffs' combined word count total for their opening brief and reply will still be more than Amazon's opposition. This is the first word extension Amazon has requested in this litigation.

For the foregoing reasons, Amazon respectfully requests the Court grant an additional 800 words for its brief in support of its opposition, for a total of 5,000 words, with the length of the reply to be governed by Local Rule 7(f)(4).

DATED this 8th day of May, 2024.

*I certify that this memorandum contains 210 words, in compliance with the Local Civil Rules.*

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