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

STIPULATED MOTION AND ORDER TO TEMPORARILY SEAL EXHIBIT B TO PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS RELATED TO SPOLIATION

NOTE ON MOTION CALENDAR:
May 23, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below regarding Exhibit B to Plaintiffs' Motion to Compel Production of Documents Related to Spoliation.

In support of this request, the parties represent the following to the Court:

1. On April 25, 2024, Plaintiffs filed a Motion to Compel Production of Documents Related to Spoliation (Dkt. #198).

2. Exhibit B to that Motion is a log of Signal screenshots for certain Amazon executives who were custodians in Plaintiffs' pre-Complaint investigation (Dkt. #201).

3. At Amazon's request, Plaintiffs filed Exhibit B under seal, *see* Bolles Decl. ¶ 7, Dkt. #200, and Amazon is requesting that the Court permanently seal Exhibit B, (Dkt. #221 at 3).

4. Plaintiffs are now filing another version of Exhibit B marked with proposed redactions in connection with Plaintiffs' Reply Regarding Plaintiffs' Motion to Seal and Plaintiffs' Response to Amazon's Motion to Seal.

5. Plaintiffs provided their redactions proposal to Amazon on May 22, 2024. In lieu of initiating new motions practice on sealing, Amazon requests to file a sur-reply addressing Plaintiffs' proposal. Plaintiffs do not oppose Amazon's request to file a sur-reply.

6. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation.

   a. The version of Exhibit B filed with the Declaration of Kara King in Support of Plaintiffs' Reply Regarding Plaintiffs' Motion to Seal and Plaintiffs' Response to Amazon's Motion to Seal is temporarily sealed, pending the Court's decision on Plaintiffs' Motion to Seal (Dkt. # 199).

   b. Amazon may file a sur-reply addressing Plaintiffs' redaction proposal for Exhibit B by Friday, May 31, 2024.

Stipulated to and respectfully submitted this 23rd day of May, 2024, by:

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ORDER

IT IS SO ORDERED.

DATED this 23rd day of May, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE