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

DECLARATION OF SHIRA A. STEINBERG IN SUPPORT OF JOINT BRIEF REGARDING INTERIM DEADLINES

I, Shira A. Steinberg, declare as follows:

1. I am an Attorney in the Federal Trade Commission's ("FTC") Bureau of Competition, and I represent the FTC in the above-captioned action. I am over eighteen years of age and am competent to testify to the matters set forth in this declaration. I make the following statements based on my personal knowledge.

2. I certify that Plaintiffs conferred in good faith with counsel for Amazon in an effort to resolve the parties' dispute without Court action. Counsel for Plaintiffs and counsel for Amazon have met and conferred at length regarding their respective proposals for interim discovery deadlines by email and through telephonic meet and confers on September 10 and 13, 2025.

FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, NW
Washington, DC 20580
(202) 326-2222

3. During a telephonic meet and confer between the parties on September 10, 2024, counsel for Amazon, Katie Trefz, stated Amazon's position was Plaintiffs should begin taking depositions before March 31, 2025. Counsel for Plaintiffs raised concerns with that approach based on prior experiences where depositions began before document production was completed, and the parties debated the need to reopen the depositions. Ms. Trefz told Plaintiffs that a discussion about reopening depositions would depend on the circumstances.

4. Attached as **Exhibit A** is a true and correct copy of a letter from Shira A. Steinberg, counsel for the FTC, to Robert D. Keeling, counsel for Amazon, dated July 16, 2024. Plaintiffs have redacted certain portions of Exhibit A that are not cited in the Joint Brief at Amazon's request, pursuant to LCR 5(g)(1).

5. Attached as **Exhibit B** is a true and correct copy of a letter from Shira A. Steinberg, counsel for the FTC, to Robert D. Keeling, counsel for Amazon, dated August 16, 2024. Plaintiffs have redacted certain portions of Exhibit B that are not cited in the Joint Brief at Amazon's request, pursuant to LCR 5(g)(1).

6. Attached as **Exhibit C** is a true and correct copy of a letter from Robert D. Keeling, counsel for Amazon, to Shira A. Steinberg, counsel for the FTC, dated August 30, 2024. Plaintiffs have redacted certain portions of Exhibit C that are not cited in the Joint Brief at Amazon's request, pursuant to LCR 5(g)(1).

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 17, 2024, in Washington, DC.

s/ Shira A. Steinberg
Shira A. Steinberg
Attorney
Bureau of Competition
Federal Trade Commission

FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, NW
Washington, DC 20580
(202) 326-2222