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

[PROPOSED] ORDER GRANTING AMAZON'S MOTION TO SEAL CERTAIN EXHIBITS SUBMITTED IN SUPPORT OF THE PARTIES' LCR 37 CLAWBACK MOTION

This matter comes before the Court on Amazon's Motion to Seal Certain Exhibits Submitted in Support of the Parties' LCR 37 Clawback Motion (the "Motion"). The Court, having considered Amazon's Motion, and all other papers submitted in connection with the Motion, and for good cause shown, GRANTS the Motion. The Court hereby ORDERS the following documents be filed under seal or redacted as follows:

Document (Dkt. #)	Pincite (If Relevant)	Description of Confidential Material Sought to be Sealed	Treatment
Exhibits 2 and 3 to Olga Musayev's Declaration, ECF Nos.	ECF Nos. 523-02 at 3, 4; 523-03 at 8, 9	Personal and identifying information of current and former Amazon employees in email threads between the parties relating to the parties' clawback disputes	Continued redaction of the identifying information on pgs. 3, 4 of Exhibit 2 and pgs. 8, 9 of Exhibit 3.

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523-02, 523-03			
The sealed versions of Exhibits 7, 8, 15, and 16 to Olga Musayev's Declaration, ECF Nos. 523-07, 523-08, 523-15, 523-16.	Sealed Versions of ECF Nos. 523-7 at 4, 5, 10-29, 523-8 at 5, 6, 9, 523-15 at 5, 6, 9-15, and 523-16 at 3	Personal and identifying information of current and former Amazon employees in cover emails in the sealed versions of ECF Nos. 523-7 at 5, 6, 523-8 at 5, 6; 523-15 at 5, 6; descriptions of internal and confidential Amazon business information in the sealed versions of ECF Nos. 523-7 at pages 10-29, 523-8 at 9, 523-15 at 9-15, 523-16 at 3	Redacted versions of Exhibits 7, 8, 15, and 16 shall be filed which redact identifying names of Amazon employees and Amazon's confidential information
The sealed versions of Exhibits 10 and 11 to Olga Musayev's Declaration, ECF Nos. 523-10 and 523-11	Employee names, titles, and personal information throughout the sealed versions of ECF Nos. 523-10 and 523-11 and internal, confidential, and privileged material at the sealed version of 523-11 at 2-3	Personal and identifying information of current and former Amazon employees in emails between Amazon employees throughout the sealed versions of ECF No. 523-10 and 523-11; descriptions of competition issues in the sealed version of ECF No. 523-11 at pages 2-3, which Amazon has clawed back as privileged and for which Plaintiffs have submitted to the Court for *in camera* review	Redacted versions of Exhibits 10 and 11 shall be filed which redact identifying names and information and Amazon's internal and confidential business and privileged information.
The sealed versions of Exhibits 13 and 14 to Olga Musayev's Declaration, ECF Nos. 523-13 and 523-14 .		Information regarding Amazon's business strategies and internal discussions on third-party logistics providers in relation to Amazon programs, including Amazon's privileged information that it has clawed back and for which Plaintiffs have submitted to the Court for *in camera* review	These documents shall remain under seal, without filing a public version.

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The sealed version of Exhibit 9 to Olga Musayev's Declaration, ECF No. 523-9	Personal information in the sealed version of ECF No. 523-9 at 1:10, 1:13, 22:9, 22:13, 22:15, 22:17-18, 22:23-25, 23:4, 24:17-20, 25:3, and 25:6; 150:2, 150:5; 150:15, 150:17, 151:11, 206:23, 151:25-152:1, 152:4, 153:21, 206:3, 207:1-2, 207:9,209:1, 210:13;211:15, and 213; and internal material at the sealed version of ECF No. 523-09 at 152:4-10 ("We …."), 206:4-6 ("3PLs …?"), 206:8-10, 206:12-14, 207:3 (after "subject"), 207:15-17 ("first …?"), 210:14-20, and 210:24 (after "of")	Personal, identifying information in a transcript excerpt for a Senior Product Manager, including: (1) the name of the deponent; (2) the name of the deponent's former company; and (3) the identifying names and information of other employees at Amazon; Amazon's internal, confidential, and at times, privileged business information concerning competition issues	A redacted version of Exhibit 9 shall be filed which redacts identifying names and information and Amazon's internal and confidential business information.
The sealed version of Exhibit 12 to Olga Musayev's Declaration, ECF No. 523-12	Personal information in the sealed version of ECF No. 523-12 at 1:16, 145:6 (after "the"), 143:7, 143:11, 146:4, 146:7-8, 146:16, 146:21, 147:3, 148:13, 149:2, 149:19, 150:10, 153:4, 153:11, 153:24, 154:5, 154:14, 154:15, 154:18, 154:25,	Personal, identifying information in a deposition transcript excerpt for a Vice President, ECF No. 523-12, including: (1) the name and identifying information of the deponent at the top of each page and (2) the identifying names and information of other employees at Amazon; Amazon's internal, confidential, and at times, privileged business information concerning third	A redacted version of Exhibit 12 shall be filed which redacts identifying names and information and Amazon's internal and confidential business information.

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	156:6, 250:13, 250:15, and 253:1, and 253:21; internal material at the sealed version of ECF No. 523-12 at 142:3-4 ("SFP…?"), 142: 11-12 ("What …?"), 142:17-20 ("3PLs …?"), 142:22-24 ("Seller …?), 143:4-5 ("3PLs …?), 143:7-8 ("have …?"), 143:13-15 ("3PLs …?"), 143:17-21 ("If … fulfillment?"), 144:1-3 ("3PLs …?"), 144:10-13 ("We …?"), 144:15 (after "understand" and before "to"), 146:23-147:1 ("We …?"), 147:3-5 ("to …?"), 147:16-17, 147:22-23, 148:17-19 ("only …?"), 149:6-10, 149:12-13, 149:19-21 ("to ….?"), 150:7-8 ("So …."), 150:10-11 ("advice …?"), 150:13-14, 151:12-14, 151:20-23, 151:25-152:1 ("You'd …."), 152:3-5, 153:4-9 ("in ….?"), 153:11-14 ("to ...?"), 153:18-21 ("3PLs ...?"), 154:2-3, 154:6-8,	party logistics providers and Amazon business strategies and considerations	

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	154:19-22, 155:2-4 ("FBA …?"), 155:11 ("FBA …?), and 155:13-14 (after "term" and before "after")		
Exhibit 1 to Robert Keeling's Declaration, No. 525-01	Exhibit 1, ECF No. 525-1 at bottom of page 3	Information regarding Amazon's internal data organization	Continued redaction of the identifying information on pg. 3 of Exhibit 1 to Robert Keeling's Declaration.

IT IS SO ORDERED

DATED this ____ day of _____, 2025.

_____
THE HONORABLE JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented by:

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