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

STIPULATED MOTION AND [PROPOSED] ORDER REGARDING SEALING ISSUES

NOTE ON MOTION CALENDAR:
January 26, 2026

On October 28, 2024, this Court entered an Order Regarding Sealing Issues, Dkt. #320, which provides a sealing mechanism by which the parties may provisionally submit documents under seal followed by a later omnibus motion to seal. The Order applied only to discovery motions filed on or before October 31, 2024. The Court has extended this Order with respect to certain motions in several instances. *See e.g.*, January 10, 2025 Order Extending Deadlines, Dkt. #396; October 28, 2024 Order Extending Deadlines, Dkt. #323; *see also* February 20, 2025 Order on Parties Stipulated Motion Regarding Sealing Issues, Dkt. #418; May 29, 2025 Order Granting Parties' [483] Stipulated Motion re Sealing Issues, Dkt. #485; Aug. 20, 2025 Order

granting the Parties' [518] Stipulated Motion Regarding Sealing of LCR 37 Joint Submission, Dkt. #519.

Plaintiffs intend to file two forthcoming motions: (1) seeking relief related to their claim of spoliation of evidence and (2) to compel the production of documents as to which Plaintiffs claim that Amazon has made unsupported privilege claims. Amazon intends to file briefs opposing Plaintiffs' respective motions. Amazon also intends to file a forthcoming motion to appoint a special master. Plaintiffs intend to file a brief opposing Amazon's motion. The parties agree that the sealing procedure above should apply. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and agree, subject to the Court's approval, that the Court's October 28, 2024 Order regarding sealing issues shall apply separately to the Plaintiffs' forthcoming motions (1) seeking relief related to their claim of spoliation of evidence and (2) to compel the production of documents as to which Plaintiffs claim that Amazon has made unsupported privilege claims, as well as (3) Amazon's motion to appoint a special master; to the Parties' respective opposition briefs; and to the Parties' respective reply briefs.

Stipulated to and respectfully submitted this [#] day of January, 2026, by:

FEDERAL TRADE COMMISSION

s/ Edward H. Takashima

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2026.

_____
JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Edward H. Takashima
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