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 KATHERINE TREFZ IN SUPPORT OF AMAZON'S RESPONSE TO PLAINTIFFS' MOTION TO COMPEL

REDACTED

I, Katherine Trefz, declare as follows:

1. I am an attorney admitted to practice law in the District of Columbia and State of California and a member in good standing of the District of Columbia and State of California Bars. I received a J.D. from the University of California, Berkeley School of Law in 2008, and a B.A. from University of Southern California in 2005.

2. I am a partner of the law firm Williams & Connolly LLP ("Williams & Connolly").

3. Amazon.com, Inc. ("Amazon") has retained Williams & Connolly as outside counsel in this case.

4. On January 20, 2026, the Parties met and conferred regarding the disputes raised in Plaintiffs' Motion to Compel the Production of Documents Concerning Amazon's

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

Manipulation of Evidence, ECF No. 604, and Plaintiffs' Motion to Impose Spoliation Sanctions, ECF No. 594. The meet and confer was attended by, among others, Shira Steinberg, Amanda Butler, and Lance McCaskey for the Plaintiffs, along with myself, Kristen DeWilde, and Kristen Knapp for Amazon. Amazon offered to work with Plaintiffs regarding any concerns Plaintiffs had over specific privilege log entries relating to communications guidance, including by offering to use search terms to identify a set of privilege log entries or to re-review certain entries identified by Plaintiffs. Plaintiffs declined to offer, accept, or counter-propose any method that would have allowed the parties to work together to identify privilege log entries that Plaintiffs thought may be insufficient.

5. Attached as **Exhibit 1** is a genuine copy of the Declaration of Amazon In-House Counsel Charles Wright in Support of Amazon's Response to Plaintiffs' Motion to Compel, ECF No. 604.

6. Attached as **Exhibit 2** is a genuine copy of the August 27, 2025 Order re Plaintiffs' Fourth Submission, issued by Special Master the Honorable Elizabeth D. Laporte (Ret.) in the *De Coster, et al. v. Amazon.com, Inc.* and Related Cases[1] litigation.

7. Attached as **Exhibit 3** is a genuine copy of the Declaration of Robert D. Keeling in Support of Amazon's Response to Plaintiffs' Motion to Compel, ECF No. 604.

8. Attached as **Exhibit 4** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on September 30, 2025.

9. Attached as **Exhibit 5** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 14, 2025.

10. Attached as **Exhibit 6** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on September 17, 2025.

[1] The Related Cases also include *Frame-Wilson v. Amazon*, No. 2:20-cv-00424-JHC (W.D. Wash.) and *Brown v. Amazon*, No. 2:22-cv-00965-JHC (W.D. Wash.).

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11. Attached as **Exhibit 7** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on May 6, 2025.

12. Attached as **Exhibit 8** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 15, 2025.

13. Attached as **Exhibit 9** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on April 18, 2025.

14. Attached as **Exhibit 10** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 18, 2025.

15. Attached as **Exhibit 11** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on May 22, 2025.

16. Attached as **Exhibit 12** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on March 27, 2025.

17. Attached as **Exhibit 13** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on April 15, 2025.

18. Attached as **Exhibit 14** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 20, 2025.

19. Attached as **Exhibit 15** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 21, 2025.

20. Attached as **Exhibit 16** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 26, 2025.

21. Attached as **Exhibit 17** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on June 18, 2025.

22. Attached as **Exhibit 18** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 17, 2025.

23. Attached as **Exhibit 19** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on October 1, 2025.

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24. Attached as **Exhibit 20** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 13, 2025.

25. Attached as **Exhibit 21** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 22, 2025.

26. Attached as **Exhibit 22** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on May 7, 2025.

27. Attached as **Exhibit 23** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on June 24, 2025.

28. Attached as **Exhibit 24** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 24, 2025.

29. Attached as **Exhibit 25** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on April 10, 2025.

30. Attached as **Exhibit 26** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 7, 2025.

31. Attached as **Exhibit 27** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on June 12, 2025.

32. Attached as **Exhibit 28** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 9, 2025.

33. Attached as **Exhibit 29** is a genuine copy of an excerpt of the transcript of the deposition of Jamil Ghani, taken on July 23, 2025.

34. Attached as **Exhibit 30** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 6, 2025.

35. Attached as **Exhibit 31** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 20, 2025.

36. Attached as **Exhibit 32** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on August 21, 2025.

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37. Attached as **Exhibit 33** is a genuine copy of an excerpt of the transcript of the deposition of [redacted], taken on July 15, 2025.

38. Attached as **Exhibit 34** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_13911751.

39. Attached as **Exhibit 35** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_14254326.

40. Attached as **Exhibit 36** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_14196786.

41. Attached as **Exhibit 37** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_14214193.

42. Attached as **Exhibit 38** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_10732599.

43. Attached as **Exhibit 39** is a genuine copy of the September 17, 2025 Second Order re Plaintiffs' Seventh Submission, issued by Special Master the Honorable Elizabeth D. Laporte (Ret.) in the *De Coster, et al. v. Amazon.com, Inc.* and Related Cases litigation.

44. Attached as **Exhibit 40** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_14033998.

45. Attached as **Exhibit 41** is a genuine copy of the September 2, 2025 Order re Plaintiffs' Eight[h] Submission, issued by Special Master the Honorable Elizabeth D. Laporte (Ret.) in the *De Coster, et al. v. Amazon.com, Inc.* and Related Cases litigation.

46. Attached as **Exhibit 42** is a genuine copy of a document produced by Amazon bearing the Bates stamp CAAGLit-AMZ_06470017.

47. Attached as **Exhibit 43** is a genuine copy of the August 13, 2025 Order re Plaintiffs' Second Submission, issued by Special Master the Honorable Elizabeth D. Laporte (Ret.) in the *De Coster, et al. v. Amazon.com, Inc.* and Related Cases litigation.

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48. Attached as **Exhibit 44** is a genuine copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-11673765.

49. Attached as **Exhibit 45** is a genuine copy of a May 9, 2025 letter from Plaintiffs' counsel Leigh Barnwell to Amazon's counsel Robert D. Keeling.

50. Attached as **Exhibit 46** is a genuine copy of a May 23, 2025 letter from Amazon's counsel Robert D. Keeling to Plaintiffs' counsel Leigh Barnwell.

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

Executed this 3rd day of March, 2026, in Washington, D.C.

/s/ Katherine Trefz
Katherine Trefz

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