UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION ET AL., Plaintiffs, v. AMAZON.COM, INC., Defendant.	CASE NO. 2:23-cv-01495-JHC ORDER

Pursuant to the Court's Order at Dkt. # 678, Plaintiff's list of documents at Dkt. # 679, Defendant's submissions to the Court, and the Court's ongoing *in camera* review, the Court DIRECTS the parties to provide supplemental briefs by June 25, 2026.

Both sides shall address the following questions, with responses not to exceed 3,150 words:

(1) Does the attorney-client privilege protect generalized training materials on legal issues and matters of legal compliance—such as when and how privilege law applies—when such materials are prepared and presented by in-house corporate counsel and shared widely throughout the organization?

(2) Does the attorney-client privilege apply differently to legal guidance on the application of privilege law as opposed to legal guidance on the application of other laws?

(3) Does the attorney-client privilege apply to guidance from a lawyer on corporate procedures, such as whom to include on an email, how to format a document, or where to save a document in the system?

(4) How do courts apply the attorney-client privilege to communications policies and guidelines that are limited to communications guidance but are designed and implemented by in-house counsel for the purpose of mitigating legal risk?

Defendant shall also provide one or more declarations that provide the following information:

(1) A brief description of the intended and actual audience for the presentations and trainings (Document Nos. 3, 4, 7, 10, 11, 12, 13), including who at Amazon was obligated or encouraged to attend such trainings.

(2) A brief description of the intended and actual audience for the document writing tips and communications best practices (Document Nos. 2, 5, 6, 8, 9, 16, 27), including who was able to access them and/or with whom they were deliberately shared.

(3) Clarification of who is speaking in the redacted portion of the meeting (Document No. 23) and clarification of if/when "in-house counsel" is speaking throughout the full meeting.

(4) Clarification of who prepared Document No. 21, the purpose for which it was prepared, and with whom it was shared.

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Dated this 18th day of June 2026.

John H. Chun
United States District Judge