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 ORDER REGARDING SEALING OF FORTHCOMING LCR 37 SUBMISSION

NOTE ON MOTION CALENDAR:
November 4, 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 initially applied only to discovery motions filed on or before October 31, 2024, but the Court has authorized use of the same or similar procedure through additional motion-specific Orders. *See, e.g.*, January 26, 2026 Order Regarding Sealing Issues, Dkt. #594 (authorizing procedure for Plaintiffs' motions regarding document preservation and privilege); October 13, 2026 Order Regarding Sealing Process for Dispositive and *Daubert* Motions, Dkt. #715 (authorizing similar procedure).

On October 26, 2026, Plaintiffs served Amazon with an LCR 37 submission seeking to compel additional discovery. Amazon provided its responsive portions of the submission on November 2, 2026. Plaintiffs intend to file the complete submission containing their replies on November 6, 2026. The parties agree that the sealing procedure previously used for discovery-related motions should apply. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and agree, subject to the Court's approval, that the following procedures, similar to those contained in Court's October 28, 2024 Order regarding sealing issues shall apply to the forthcoming LCR 37 submission concerning Plaintiffs' motion to compel additional discovery:

1. Plaintiffs shall provisionally file under seal the LCR 37 submission, including accompanying declarations and exhibits, containing material designated Highly Confidential—Attorneys' Eyes Only or Confidential under the Protective Order. Plaintiffs shall contemporaneously file a public version of any sealed documents, redacting only the material that is provisionally filed under seal. No party is required to file a motion to seal at the same time Plaintiffs file the sealed documents.

2. Nothing in this Stipulation and Order relieves the parties of their obligations, under Local Civil Rule 5(g)(1)(A), to meet and confer before any filing to determine whether the designating party will withdraw its confidentiality designations.

3. Within 14 days of the filing of the LCR 37 submission, any party seeking to maintain under seal any material that was provisionally filed under seal pursuant to Paragraph 1 above shall file one omnibus motion to seal. The moving party or non-party shall include a table identifying: the document containing material to be maintained under seal, including docket number; a pincite for the material to be maintained under seal; and the basis for maintaining that material under seal.

4. Any material provisionally filed under seal pursuant to Paragraph 1 that is not the subject of a motion to seal filed within 14 days of the LCR 37 submission shall be deemed unsealed the following business day.

Stipulated to and respectfully submitted this 4th day of November, 2026.

FEDERAL TRADE COMMISSION

s/ Shira A. Steinberg (w/permission)

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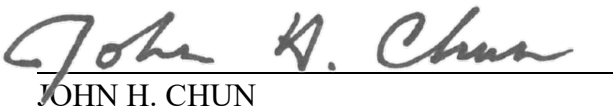
ORDER

IT IS SO ORDERED.

DATED this 5th day of November, 2026.



JOHN H. CHUN
UNITED STATES DISTRICT JUDGE