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 EDWARD H. TAKASHIMA IN SUPPORT OF PLAINTIFFS' LCR 37 JOINT SUBMISSION REGARDING SPOLIATION DISCOVERY

I, Edward H. Takashima, declare as follows:

1. I am an attorney in the Federal Trade Commission's ("FTC") Bureau of Competition, and I represent the FTC in the above-captioned action. I am over eighteen years of age and am competent to testify to the matters set forth in this declaration. I make the following statements based on my personal knowledge.

2. I certify that Plaintiffs conferred in good faith with counsel for Amazon in an effort to resolve the parties' disputes without Court action and have reached an impasse. Counsel for Plaintiffs and counsel for Amazon have met and conferred at length regarding Plaintiffs' RFP Nos. 408-410, 412-414 and Interrogatory No. 31, both by email and letter exchanges and through telephonic meet and confers on June 5, 2026 and July 30, 2026.

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3. The parties corresponded regarding Plaintiffs' spoliation discovery requests through August 2026, and Amazon substantially completed its production of documents in response to agreed-upon requests on September 7, 2026. Amazon served an accompanying privilege log and completed its production of documents on September 14, 2026.

4. Attached as **Exhibit 1** is a true and correct copy of a letter from Shira A. Steinberg, counsel for the FTC, to Katie Trefz, counsel for Amazon, dated July 2, 2026.

5. Attached as **Exhibit 2** is a true and correct copy of a letter from Shira A. Steinberg, counsel for the FTC, to Katie Trefz, counsel for Amazon, dated July 27, 2026.

6. Attached as **Exhibit 3** is a true and correct copy of a letter from Katie Trefz, counsel for Amazon, to Shira A. Steinberg, counsel for the FTC, dated July 20, 2026.

7. Attached as **Exhibit 4** is a true and correct copy of a letter from Katie Trefz, counsel for Amazon, to Shira A. Steinberg, counsel for the FTC, dated June 17, 2026.

8. Attached as **Exhibit 5** is a true and correct copy of an excerpt from the Rule 30(b)(6) deposition transcript of Robert Keeling in this matter, dated August 21, 2024.

9. Attached as **Exhibit 6** is a true and correct copy of a news article by Eugene Kim, *Jeff Bezos's elite Amazon 'S-team' just got a new addition -- here's a full rundown of everybody on it*, CNBC (May 29, 2019), https://www.cnbc.com/2019/05/29/amazons-bezos-promoted-aws-executive-peter-desantis-to-his-s-team.html, downloaded on Oct. 26, 2026.

10. Attached as **Exhibit 7** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15734337.

11. Attached as **Exhibit 8** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15972881.

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12. Attached as **Exhibit 9** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15972882.

13. Attached as **Exhibit 10** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15969682.

14. Attached as **Exhibit 11** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15679556.

15. Attached as **Exhibit 12** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15681637.

16. Attached as **Exhibit 13** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15951202.

17. Attached as **Exhibit 14** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-11054761.

18. Attached as **Exhibit 15** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15677329.

19. Attached as **Exhibit 16** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15678386.

20. Attached as **Exhibit 17** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15934743.

21. Attached as **Exhibit 18** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15680961.

22. Attached as **Exhibit 19** is a true and correct copy of a document produced by Amazon bearing the Bates stamp AMZN-RTL-FTC-15680898.

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23. Attached as **Exhibit 20** is a true and correct copy of a document produced by Amazon bearing the Bates stamp Amazon-FTC-CID_10294467.

24. Attached as **Exhibit 21** is a true and correct copy of an email from Alex Peerman, counsel for Amazon, to Edward H. Takashima and Shira A. Steinberg, counsel for the FTC, dated August 5, 2026.

25. Attached as **Exhibit 22** is a true and correct copy of a letter from Shira A. Steinberg, counsel for the FTC, to Katie Trefz, counsel for Amazon, dated May 15, 2026.

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

Executed on November 6, 2026, in Washington, D.C.

s/ Edward H. Takashima
EDWARD H. TAKASHIMA

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