

The Honorable John H. Chun

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

SONNY JOYCE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, JEFFREY P. BEZOS, BRIAN T.  
OLSAVSKY, DAVID A. ZAPOLSKY, and  
NATE SUTTON,

Defendants.

Case No.: 2:22-cv-00617-JHC

CONSOLIDATED CASES

**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE  
AMENDED COMPLAINT AND  
SETTING BRIEFING SCHEDULE**

ASBESTOS WORKERS PHILADELPHIA  
WELFARE AND PENSION FUND, on  
behalf of itself and all others similarly  
situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, BRIAN T. OLSAVSKY, and  
DAVID FILDES,

Defendants.

Case No.: 2:22-cv-00934-JHC

**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE**

Case No.: 2:22-cv-00617-JHC

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DETECTIVES ENDOWMENT  
ASSOCIATION ANNUITY FUND,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, BRIAN T. OLSAVSKY, and  
DAVID FILDES,

Defendants.

Case No.: 2:22-cv-00950-JHC

1 **STIPULATED MOTION**

2 Lead Plaintiffs Universal-Investment-Gesellschaft mbH, Universal-Investment-  
3 Luxembourg S.A., Menora Mivtachim Insurance Ltd., Menora Mivtachim Pensions and Gemel  
4 Ltd., The Phoenix Insurance Company, Ltd., and The Phoenix Provident Pension Fund Ltd., with  
5 named plaintiffs Asbestos Workers Philadelphia Welfare and Pension Fund and Detectives  
6 Endowment Association Annuity Fund (collectively, “Plaintiffs”), and Defendants Amazon.com.,  
7 Inc., Jeffrey P. Bezos, Andrew R. Jassy, Brian T. Olsavsky, David A Zapolsky, Nate Sutton and  
8 David Fildes (“Defendants,” and together with Plaintiffs, the “Parties”), respectfully request that  
9 the Court enter the proposed order providing for a revised deadline for Plaintiffs to file their Second  
10 Consolidated Amended Complaint until February 6, 2024 and setting a schedule that has been  
11 agreed-upon by the Parties for subsequent briefing deadlines if Defendants file a motion to dismiss  
12 (set forth below).

13 In support of this request, the Parties state as follows:

14 **WHEREAS**, on September 20, 2022, Plaintiffs filed their Consolidated Class Action  
15 Complaint (“Consolidated Complaint”) (ECF No. 70);

16 **WHEREAS**, on November 21, 2022, Defendants moved to dismiss the Consolidated  
17 Complaint (“Motion,” ECF Nos. 75-76) and the Motion was fully briefed as of March 6, 2023  
18 (ECF Nos. 82-85);

19 **WHEREAS**, on December 4, 2023, this Court entered its order on the Motion (“Order,”  
20 ECF No. 92);

21 **WHEREAS**, in the Order, the Court dismissed the Consolidated Complaint with leave to  
22 replead, granting “Plaintiffs leave until January 16, 2024 to file a second Consolidated Amended  
23 Complaint” (Order at 40);

24 **WHEREAS**, the Parties have met and conferred and agree that a three-week extension to  
25 the current deadline for filing of a Second Consolidated Amended Complaint is warranted, after  
26 considering the pre-existing obligations of Plaintiffs and their counsel and the upcoming holiday  
27 season;

28 **STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE**

Case No.: 2:22-cv-00617-JHC



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17 *Counsel for the Detectives Endowment*  
18 *Association Annuity Fund*

1 **ORDER**

2 THIS MATTER came before the Court on the Stipulated Motion Extending Time To File  
3 Amended Complaint and Setting Briefing Schedule (“Stipulated Motion”), filed jointly by Lead  
4 Plaintiffs Universal-Investment-Gesellschaft mbH, Universal-Investment-Luxembourg S.A.,  
5 Menora Mivtachim Insurance Ltd., Menora Mivtachim Pensions and Gemel Ltd., The Phoenix  
6 Insurance Company, Ltd., and The Phoenix Provident Pension Fund Ltd., with named plaintiffs  
7 Asbestos Workers Philadelphia Welfare and Pension Fund and Detectives Endowment  
8 Association Annuity Fund (collectively, “Plaintiffs”), and Defendants Amazon.com., Inc., Jeffrey  
9 P. Bezos, Andrew R. Jassy, Brian T. Olsavsky, David A Zapolsky, Nate Sutton and David Fildes,  
10 (“Defendants,” and together with Plaintiffs, the “Parties”).

11 Having reviewed the Parties’ Stipulated Motion and for good cause shown, the Court  
12 hereby GRANTS the Stipulated Motion and set forth the following schedule:

- 13 1. Plaintiffs shall file the Second Amended Consolidated Complaint on Tuesday,  
14 February 6, 2024.
- 15 2. Defendants shall move to dismiss or file their answer to the Second  
16 Consolidated Amended Complaint on Monday, April 15, 2024.
- 17 3. Plaintiffs shall file their opposition to any motion by Defendants to dismiss the  
18 Second Consolidated Amended Complaint on Friday, June 14, 2024.
- 19 4. Defendants shall file a reply brief in support of any motion to dismiss on  
20 Monday, July 29, 2024.

21 **IT IS SO ORDERED.**

22 DATED this 13th day of December, 2023.

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25 THE HONORABLE JOHN H. CHUN  
26 UNITED STATES DISTRICT JUDGE

27  
28 **STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE**

Case No.: 2:22-cv-00617-JHC