

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:22-cv-00965-JHC

**STIPULATED MOTION AND ORDER
REGARDING CLASS
CERTIFICATION BRIEFING
SCHEDULE**

1 **STIPULATION**

2 The parties, by and through their counsel, have agreed and stipulate as follows:

3 1. The parties agree that good cause justifies an extension of the Court’s current
4 class certification briefing schedule, including to allow sufficient time to coordinate depositions
5 with other litigation, including the appropriate depositions before a class certification motion.
6 The parties agreed to “coordinate depositions of Amazon witnesses and minimize duplicative
7 discovery in this matter and the *People of California* actions, as well as overlapping discovery in
8 other litigation, including the *Frame-Wilson* and *De Coster* litigations.” Dkt. 50 at p.8. The
9 parties seek an adjustment of the class certification briefing schedule to make coordinated
10 depositions more feasible. They are, however, still working out the amount of time that will be
11 needed to achieve coordination of the depositions that Plaintiffs believe are needed before filing
12 their class certification motion.

13 2. In the interim, to provide certainty to the parties and avoid motion practice while
14 they discuss the additional adjustment to the schedule, the parties agree to a minimum two-
15 month extension of the current briefing deadlines.

16 3. The parties propose an interim modification of the schedule as follows:

	Current Schedule (Dkt. 57)	Proposed Schedule
Deadline for Plaintiffs to file motion for class certification	September 16, 2024	November 18, 2014
Opposition to Motion to Certify Class	December 16, 2024	February 18, 2025
Reply in Support of Motion to Certify Class	March 27, 2025	May 27, 2025
Hearing on Motion to Certify Class	To be set by the Court after briefing completed	To be set by the Court after briefing completed

26 4. Upon completion of the parties’ discussions, they will proceed to make any
27 further schedule proposals to the Court.
28

1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties,
2 through their undersigned counsel of record, and the parties ask the Court to order, that:

3 1. The deadline for Plaintiffs to file their class certification motion is extended to
4 November 18, 2024.

5 2. The deadline for Amazon to respond to Plaintiffs' motion is February 18, 2025.

6 3. The deadline for Plaintiffs' reply brief is May 27, 2025.

7 IT IS SO STIPULATED.

8 DATED: January 25, 2024

HAGENS BERMAN SOBOL SHAPIRO LLP

9 By /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

10 By /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

11 1301 Second Avenue, Suite 2000

12 Seattle, WA 98101

13 Telephone: (206) 623-7292

14 Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

barbaram@hbsslaw.com

15 Anne F. Johnson (*pro hac vice*)

16 68 3rd Street, Suite 249

17 Brooklyn, NY 11231

18 Telephone: (718) 916-3520

E-mail: annej@hbsslaw.com

19 KELLER POSTMAN LLC

20 Zina G. Bash (*pro hac vice*)

21 111 Congress Avenue, Suite 500

22 Austin, TX, 78701

23 Telephone: (512) 690-0990

E-mail: zina.bash@kellerpostman.com

24 Jessica Beringer (*pro hac vice*)

25 Shane Kelly (*pro hac vice*)

26 150 North Riverside Plaza, Suite 4100

27 Chicago, Illinois 60606

28 Telephone: (312) 741-5220

E-mail: Jessica.Beringer@kellerpostman.com

E-mail: shane.kelly@kellerpostman.com

1 Daniel Backman (*pro hac vice*)
2 1101 Connecticut Avenue, N.W., Suite 1100
3 Washington, D.C., 20036
4 Telephone: 202-918-1123
5 E-mail: Daniel.Backman@kellerpostman.com

6 QUINN EMANUEL URQUHART &
7 SULLIVAN, LLP

8 By: /s/ Alicia Cobb

9 Alicia Cobb, WSBA # 48685
10 1109 First Avenue, Suite 210
11 Seattle, WA 98101
12 Telephone: (206) 905-7000
13 Email: aliciacobb@quinnemanuel.com

14 Steig D. Olson (*pro hac vice*)
15 David D. LeRay (*pro hac vice*)
16 Nic V. Siebert (*pro hac vice*)
17 Maxwell P. Deabler-Meadows (*pro hac vice*)
18 51 Madison Avenue, 22nd Floor
19 New York, NY 10010
20 Telephone: (212) 849-7000
21 Email: steigolson@quinnemanuel.com
22 Email: davidleray@quinnemanuel.com
23 Email: nicolassiebert@quinnemanuel.com
24 Email: maxmeadows@quinnemanuel.com

25 Adam B. Wolfson (*pro hac vice*)
26 865 South Figueroa Street, 10th Floor
27 Los Angeles, CA 90017-2543
28 Telephone: (213) 443-3000
Email: adamwolfson@quinnemanuel.com

Counsel for Plaintiffs and the proposed Class

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA # 40980
MaryAnn Almeida, WSBA #49086
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Email: JohnGoldmark@dwt.com
Email: MaryAnnAlmeida@dwt.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Karen L. Dunn (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
Martha L. Goodman (*pro hac vice*)
Kyle Smith (*pro hac vice*)
2001 K Street, NW
Washington, D.C. 20006-1047
Telephone: (202) 223-7300
Email: kdunn@paulweiss.com
Email: wisaacson@paulweiss.com
Email: amauser@paulweiss.com
Email: mgoodman@paulweiss.com
Email: ksmith@paulweiss.com

Attorneys for Defendant Amazon.com, Inc.

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: January 25, 2024



John H. Chun
UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28