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HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

REBECCA STELMAN, MARK OCHOA,  
IAN COLEMAN, CAITLYN  
HOLLERBACH, LOUIS WEATHERSTON,  
DEMETRIES WRIGHT, JONAS NYARIS,  
JANNI SAMUEL, MAIRA HERNANDEZ,  
and LINDSAY MOORE, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

AMAZON.COM INC.; AMAZON  
LOGISTICS, INC.; TEM EXPRESS  
LOGISTICS LLC dba TEMEX LOGISTICS  
and TEML, a Washington limited liability  
company; TORITSE ORUBU, individually  
and on behalf of the marital community  
composed of TORITSE ORUBU and J. DOE  
ORUBU; BUTCHIE BOY PRODUCTIONS,  
INC. d/b/a EXSELON, a Washington  
corporation; JEFFREY BUTCHER,  
individually and on behalf of the marital  
community composed of JEFFREY  
BUTCHER and KATHRYN BUTCHER;  
KATHRYN BUTCHER, individually and on  
behalf of the marital community composed  
of KATHRYN BUTCHER and JEFFREY  
BUTCHER; ASTEROIDS GROUP LLC dba  
ASTG, a Washington limited liability  
company; KINGSLEY ONUCHUKWU,  
individually and on behalf of the marital  
community composed of KINGSLEY

Case No. 2:22-cv-01632-RSM

**STIPULATION AND ORDER  
EXTENDING DEFENDANTS'  
DEADLINE TO ANSWER  
OR RESPOND TO COMPLAINT**

Noted For: November 21, 2022

STIPULATION AND ORDER  
EXTENDING DEFENDANTS'  
DEADLINE TO ANSWER OR  
RESPOND TO COMPLAINT – 1  
CASE NO. 2:22-cv-01632-RSM

**MORGAN, LEWIS & BOCKIUS LLP**  
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1 ONUCHUKWU and J. DOE  
2 ONUCHUKWU; ANAHIT MANUKYAN,  
3 individually and on behalf of the marital  
4 community composed of ANAHIT  
5 MANUKYAN and J. DOE MANUKYAN;  
6 BENCHMARK TRANSPORT, LLC, a  
7 Washington limited liability company;  
8 DAMIEN WAGNER, individually and on  
9 behalf of the marital community composed  
10 of DAMIEN WAGNER and J. DOE  
11 WAGNER; ALDEN RADONCIC (aka  
12 ALDEN RADD), individually and on behalf  
13 of the marital community composed of  
14 ALDEN RADONCIC and J. DOE  
15 RADONCIC; THE TOTAL PACKAGE  
16 LOGISTICS, LLC, a Washington limited  
17 liability company; JEREMY FIXLER,  
18 individually and on behalf of the marital  
19 community composed of JEREMY FIXLER  
20 and HEATHER FIXLER; HEATHER  
21 FIXLER individually and on behalf of the  
22 marital community composed of HEATHER  
23 FIXLER and JEREMY FIXLER; NANCY  
24 LUNA, individually and on behalf of the  
25 marital community composed of NANCY  
26 LUNA and J. DOE LUNA; ASLAR  
LOGISTICS LLC, a Washington limited  
liability company; LAURA JOHNSON,  
individually and on behalf of the marital  
community composed of LAURA  
JOHNSON and JOSHUA JOHNSON;  
JOSHUA JOHNSON, individually and on  
behalf of the marital community composed  
of JOSHUA JOHNSON and LAURA  
JOHNSON; GOPLAY LOGISTICS LLC, a  
Washington limited liability company;  
TRACY PELLETT, individually and on  
behalf of the marital community composed  
of TRACY PELLETT and J. DOE  
PELLETT; AVANATOR.COM LLC, a  
Washington limited liability company;  
RICHARD ZECH, individually and on  
behalf of the marital community composed  
of RICHARD ZECH and J. DOE ZECH;  
POLE POSITION EXPRESS LOGISTICS  
LLC, a Washington limited liability  
company; DENNIS HANNAH, individually  
and on behalf of the marital community  
composed of DENNIS HANNAH and J.  
DOE HANNAH; TRUE MANAGEMENT  
LLC, a Washington limited liability

STIPULATION AND [PROPOSED] ORDER EXTENDING  
DEFENDANTS' DEADLINE TO ANSWER OR RESPOND TO  
COMPLAINT – 2  
CASE NO. 2:22-cv-01632-RSM

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1 company; CHRISTOPHER LILLEY,  
2 individually and on behalf of the marital  
community composed of CHRISTOPHER  
LILLEY and J. DOE LILLEY; B.B.W.  
3 HOLDINGS, INC., a Michigan corporation;  
BARRY WILLIAMS, individually and on  
4 behalf of the marital community composed  
of BARRY WILLIAMS and J. DOE  
5 WILLIAMS; PARAGON DELIVERIES  
INC., a Washington corporation; and  
6 JORDAN OFFUTT, individually and on  
behalf of the marital community composed  
7 of JORDAN OFFUTT and J. DOE OFFUTT,

8 Defendants.

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11 **STIPULATION**

12 Defendants Amazon.com, Inc., Amazon Logistics, Inc., TEM Express Logistics LLC d/b/a  
13 Temex Logistics, Tortise Orubu, Aslar Logistics LLC, Laura Johnson, Joshua Johnson,  
14 Avanator.com LLC, Richard Zech, The Total Package Logistics, LLC, Jeremy Fixler, Heather  
15 Fixler, Nancy Luna, Asteroids Group LLC d/b/a ASTG, Kinglsey Onuchukwu, Anahit Manukyan,  
16 Butchie Boy Productions, INC. d/b/a Exselon, Jeffrey Butcher, Kathryn Butcher, Paragon  
17 Deliveries Inc., Jordan Offutt, True Management LLC, and Christopher Lilley (collectively, the  
18 “Served Defendants”) and Plaintiffs hereby STIPULATE AND AGREE to extend the deadline for  
19 the Served Defendants to answer or otherwise respond to the Complaint to December 21, 2022.

20 Defendants Amazon.com, Inc. and Amazon Logistics, Inc. removed this action on  
21 November 14, 2022. *See* Dkt. No. 1. Prior to removal, none of the Served Defendants had  
22 answered or otherwise responded to the Complaint. Pursuant to Rule 81(c)(2)(C), the Served  
23 Defendants’ answer or other response is currently due on November 21, 2022. Counsel for  
24 Plaintiffs and the Served Defendants have conferred. In light of the number and complexity of  
25 legal issues, and the number of named corporate and individual defendants, as well as the

1 numerous putative classes and sub-classes proposed in Plaintiffs' 41-page Complaint, there is good  
2 cause to grant the parties' stipulated request for additional time so that all parties and the Court  
3 have ample time to address and consider all such issues. Accordingly, Plaintiffs and the Served  
4 Defendants stipulate and agree, subject to the Court's approval, to extend the Served Defendants'  
5 deadline to answer or otherwise respond by 30-days to **December 21, 2022**.

6 This stipulation and order shall not operate as an admission of any factual allegation or  
7 legal conclusion, nor shall it operate as a waiver nor affect any right, defense, claim or objection,  
8 including lack of jurisdiction and the right to seek arbitration of Plaintiffs' claims.

9 *IT IS SO STIPULATED.*

10 DATED this 21<sup>st</sup> day of November, 2022.

11 **MORGAN, LEWIS & BOCKIUS LLP**

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15 *LLC, Laura Johnson, Joshua Johnson,*  
16 *Avanator.com LLC, Richard Zech, The Total*  
17 *Package Logistics, LLC, Jeremy Fixler, Heather*  
18 *Fixler, Nancy Luna, Asteroids Group LLC dba*  
19 *ASTG, Kinglsey Onuchukwu, Anahit Manukyan,*  
20 *Butchie Boy Productions, INC. d/b/a Exselon,*  
21 *Jeffrey Butcher, Kathryn Butcher, Paragon*  
22 *Deliveries INC., Jordan Offutt, True Management*  
23 *LLC, and Christopher Lilley*

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*Attorneys for Plaintiffs and the Proposed Class*

**ORDER**

IT IS SO ORDERED.

DATED this 22<sup>nd</sup> day of November, 2022.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

*Presented by:*

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STIPULATION AND [PROPOSED] ORDER EXTENDING  
DEFENDANTS' DEADLINE TO ANSWER OR RESPOND TO  
COMPLAINT – 6  
CASE NO. 2:22-cv-01632-RSM

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