

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 10-CIV-20718-COOKE/BANDSTRA

ALBERT SEGAL, and
MARIANNA CHAPAROVA,

Plaintiffs,

- vs. -

AMAZON.COM, INC.,

Defendant.

**DEFENDANT AMAZON.COM, INC.'S NOTICE OF FILING
DOCUMENTS IN SUPPORT OF ITS MOTIONS TO COMPEL AND MOTION TO
EXTEND THE FACT DISCOVERY AND DISPOSITIVE MOTION DEADLINES**

Defendant Amazon.com, Inc. ("Amazon") hereby gives notice of filing the following documents in support of its Motion to Compel Plaintiffs to Appear for Deposition, Motion to Compel Plaintiffs to Provide Contact Information for the Witnesses on Their Witness List, and Motion to Extend the Fact Discovery and Dispositive Motion Deadlines [D.E. 40]:

1. December 20, 2010 Certificate of Non-Appearance for Marianna Chaparova (demonstrating that Ms. Chaparova failed to appear for her scheduled deposition on December 20, 2010) (attached hereto as Exhibit A);
2. December 22, 2010 Certificate of Non-Appearance for Albert Segal (demonstrating that Mr. Segal failed to appear for his scheduled deposition on December 22, 2010) (attached hereto as Exhibit B);
3. December 22, 2010 Second Notice of Deposition of Marianna Chaparova (demonstrating that, after Ms. Chaparova failed to appear for her December 20, 2010 deposition, Amazon attempted to re-schedule Ms. Chaparova's deposition to occur before the January 3, 2011 fact-discovery cut-off) (attached hereto as Exhibit C);
4. December 22, 2010 Second Notice of Deposition of Albert Segal (demonstrating that, after Mr. Segal failed to appear for his December 22, 2010 deposition, Amazon attempted to re-schedule Mr. Segal's deposition to occur before the

January 3, 2011 fact-discovery cut-off) (attached hereto as Exhibit D);

5. January 3, 2011 Certificate of Non-Appearance for Marianna Chaparova (demonstrating that Ms. Chaparova also failed to appear for her re-scheduled deposition on January 3, 2011) (attached hereto as Exhibit E);
6. January 3, 2011 Certificate of Non-Appearance for Albert Segal (demonstrating that Mr. Segal also failed to appear for his re-scheduled deposition on January 3, 2011) (attached hereto as Exhibit F).

Dated: January 4, 2011

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Counsel for Defendant Amazon.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing system:

/s/ David B. Esau
David B. Esau

SERVICE LIST

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