STIPULATATION AND [PROPOSED] ORDER PERMITTING DEPOSITIONS 27 AFTER DISCOVERY CUTOFF

(No. 2:18-cv-00356-RSL) - 1

4830-3468-2757v.1 0051461-001944

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- 2. Due to scheduling constraints of counsel and various party witnesses, and due to the fact that several parties reside or are currently located in China, the parties have agreed to take certain depositions after the February 3 discovery cutoff, namely:
 - a. Amazon.com, Inc's Rule 30(b)(6) deposition will be taken the week of February 4, 2018;
 - b. Vera Bradley Designs LLC's Rule 30(b)(6) deposition will be taken the week of February 11, 2018;
 - Daixiuzhen Diaxuzhen and Wenjuan Liu's depositions will be taken between February 18 and 29, 2018, if necessary.
- 3. Accordingly, the parties have agreed—and respectfully request the Court's leave—to take these depositions after the February 3, 2018 discovery cutoff. This stipulation will <u>not</u> require the amendment or postponement of any other case deadlines, including the dispositive motions deadline or the trial date.

ORDER

IT IS SO ORDERED.

DATED this day of January, 2019.

The Honorable Robert S. Lasnik United States District Judge

W. Slasuik

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Stipulated and jointly presented by: 1 2 3 DAVIS WRIGHT TREMAINE LLP Attorneys for Plaintiffs Amazon.com, Inc. and 4 Vera Bradley Designs, Inc. 5 By /s/ James Harlan Corning Bonnie E. MacNaughton, WSBA #36110 6 James Harlan Corning, WSBA #45177 1201 Third Avenue, Suite 2200 7 Seattle, WA 98101-3045 Tel: (206) 622-3150 8 Fax: (206) 757-7700 Email: bonniemacnaughton@dwt.com 9 jamescorning@dwt.com 10 CLOUTIER ORTEGA PLLC JOHNSON JACOBOWITZ & ARNOLD PC 11 Attorneys for Defendants Yoko Nakamura & Attorneys for Defendants Daixiuzhen Zhenyao Yang Diazuzhen, Zhu Young Cheng, Jun Fan, Akira 12 Nakamura, Lili Nelson, Wunjun Song, & By /s/ Priva Sinha Cloutier * Wenjuan Liu 13 Priya Sinha Cloutier, WSBA No. 37407 1700 Westlake Ave. N., Suite 200 By /s/ Nathan J. Arnold * 14 Seattle, Washington 98109 Nathan J. Arnold, WSBA No. 45356 Tel: (206) 319-9001 2701 First Ave, Suite 340 15 Fax: (206) 693-4422 Seattle, WA 98121 Email: priya@cotechlaw.com Tel: (206) 866-3230 16 Email: nathan@jjalaw.com 17 18 19 20 21 22 23 24 25 * Electronic signatures authorized via e-mail on 1/10/19. 26 STIPULATATION AND (PROPOSED) ORDER PERMITTING DEPOSITIONS 27 AFTER DISCOVERY CUTOFF (No. 2:18-cv-00356-RSL) - 3 Davis Wright Tremaine LLP LAW OFFICES 920 Fifth Avenue, Suite 3300 Seattle, WA 98104-1610 4830-3468-2757v.1 0051461-001944

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