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The Honorable Robert S. Lasnik

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AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; and VERA BRADLEY DESIGNS,

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

Plaintiffs,

V.

WEI "TONY" JIANG, et al.,

INC. an Indiana corporation,

Defendants.

No. 2:18-cv-00356-RSL

SECOND STIPULATATION AND [PROPOSED] ORDER PERMITTING CERTAIN DEPOSITIONS AFTER DISCOVERY CUTOFF

Noted for Consideration: February 1, 2019

Plaintiffs Amazon.com, Inc. ("Amazon") and Vera Bradley Designs, Inc. ("Vera Bradley"), and Defendants Daixiuzhen Diaxuzhen, Zhu Young Cheng, Zhenyao Yang, Yoko Nakamura, Jun Fan, Akira Nakamura, Lili Nelson, Wenjun Song, and Wenjuan Liu jointly present the following stipulation and request that the Court enter the proposed subjoined order.

STIPULATION

- 1. On May 10, 2018, the Court entered a minute order setting the trial dates and related deadlines in this case. In that order, the Court required discovery to be completed by February 3, 2019.
- 2. On January 11, 2019, the Court entered an order granting the parties' stipulated request to permit certain depositions to take place after the discovery cutoff.

SECOND STIP. AND [FROPOSED] ORDER PERMITTING DEPOSITIONS AFTER DISCOVERY CUTOFF (No. 2:18-cv-00356-RSL) - 1

4832-0850-0870v.1 0051461-001944

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- 3. Due to scheduling constraints of counsel and one of the defendants, who is currently located in China, the parties have further agreed to take Defendant Zhenyao Yang's deposition during the week of February 11, 2019.
- 4. Accordingly, the parties have agreed—and respectfully request the Court's leave—to take this deposition after the February 3, 2018 discovery cutoff. This stipulation will not 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 February, 2019.

The Honorable Robert S. Lasnik United States District Judge

SECOND STIP. AND [PROPOSED] ORDER PERMITTING DEPOSITIONS AFTER DISCOVERY CUTOFF (No. 2:18-cv-00356-RSL) - 2

Stipulated and jointly presented by: 1 2 DAVIS WRIGHT TREMAINE LLP 3 Attorneys for Plaintiffs Amazon.com, Inc. and Vera Bradley Designs, Inc. 4 By /s/ James Harlan Corning 5 Bonnie E. MacNaughton, WSBA #36110 James Harlan Corning, WSBA #45177 1201 Third Avenue, Suite 2200 6 Seattle, WA 98101-3045 Tel: (206) 622-3150 Fax: (206) 757-7700 8 Email: bonniemacnaughton@dwt.com jamescorning@dwt.com 9 10 CLOUTIER ORTEGA PLLC JOHNSON JACOBOWITZ & ARNOLD PC Attorneys for Defendants Yoko Nakamura & Attorneys for Defendants Daixiuzhen 11 Zhenyao Yang Diazuzhen, Zhu Young Cheng, Jun Fan, Akira Nakamura, Lili Nelson, Wunjun Song, & 12 By /s/ Priya Sinha Cloutier * Wenjuan Liu Priya Sinha Cloutier, WSBA No. 37407 13 1700 Westlake Ave. N., Suite 200 By /s/ Nathan J. Arnold ** Seattle, Washington 98109 Nathan J. Arnold, WSBA No. 45356 14 Tel: (206) 319-9001 2701 First Ave, Suite 340 Fax: (206) 693-4422 Seattle, WA 98121 15 Email: priya@cotechlaw.com Tel: (206) 866-3230 Email: nathan@jjalaw.com 16 17 18 19 20 21 22 23 24 * Electronic signature authorized via e-mail on 1/27/19. 25 ** Electronic signature authorized via email on 2/1/19. 26 SECOND STIP. AND [PROPOSED] ORDER 27 PERMITTING DEPOSITIONS AFTER DISCOVERY CUTOFF (No. 2:18-cv-00356-RSL) - 3 Davis Wright Tremaine LLP 4832-0850-0870v.1 0051461-001944

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