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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all others similarly situated,

Case No. 2:21-cv-00693-RSM

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

DEBORAH FRAME-WILSON, *et al.*, on  
behalf of themselves and all others similarly  
situated,

Case No. 2:20-cv-00424-RSM

Plaintiffs,

**STIPULATED MOTION AND ORDER  
RELATING TO DATA STORAGE**

v.

**NOTE ON MOTION CALENDAR:  
July 18, 2023**

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

1 The parties, by and through their counsel, stipulate and agree as follows.

2 1. The parties have met and conferred about the logistics regarding the transfer of  
3 large electronic files with respect to Amazon’s forthcoming data production.

4 2. The parties contemplate that Plaintiffs will store data produced in these matters in  
5 an Amazon Web Services (“AWS”) S3 storage space.

6 3. Plaintiffs’ experts contemplate performing analyses on such data within that  
7 storage space.

8 IT IS HEREBY STIPULATED AND AGREED, and the Parties ask the Court to order,  
9 that:

10 a. Amazon personnel with responsibility for this litigation shall not access or view  
11 that AWS S3 storage space, except to upload data to it, nor will they monitor Plaintiffs’ storage  
12 space to obtain information about how Plaintiffs are putting data to use for purposes of litigation  
13 analyses;

14 b. If, despite their forbearance, Amazon personnel with responsibility for this  
15 litigation nonetheless obtain such information, Amazon’s counsel shall promptly notify  
16 Plaintiffs’ counsel; and

17 c. The data will otherwise be subject to Amazon’s standard data and privacy  
18 protections and procedures.

19 DATED this 18th day of July, 2023

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26 *proposed Classes*

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*Attorneys for Defendant Amazon.com, Inc.*

**ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

DATED this 19<sup>th</sup> day of July, 2023.



**RICARDO S. MARTINEZ**  
**UNITED STATES DISTRICT JUDGE**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2023, a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Steve W. Berman  
Steve W. Berman