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THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CAROL COOPER, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
Corporation, and AMAZON.COM SERVICES,
LLC, a Washington Limited Liability
Company,

Defendants.

Case No.: 2:21-cv-00915-JCC

**STIPULATED MOTION TO TRANSFER
VENUE AND [~~PROPOSED~~] ORDER**

NOTE ON MOTION CALENDAR:
August 12, 2021

STIPULATION

Plaintiff Carol Cooper and Defendants Amazon.com, Inc. and Amazon.com Services, LLC
("Amazon") jointly stipulate and move the Court as follows:

WHEREAS, Plaintiff originally filed this action in the United States District Court for the
Western District of Washington;

WHEREAS, pursuant to Defendants' request, discussions between the parties, and 28
U.S.C. § 1404(a), all parties consent to transfer venue to the United States District Court for the
Northern District of Illinois ("N.D. Ill.");

WHEREAS, the convenience of the parties and witnesses are likely to be advanced by
transfer because travel to the N.D. Ill. will be more convenient for Plaintiff and relevant evidence
and witnesses are likely to be located within Illinois and/or the N.D. Ill.;

1 WHEREAS, the interests of justice and judicial economy are likely to be advanced by
2 transfer to the N.D. Ill. because an action pending in that district concerns substantially the same
3 parties, property, transaction, or event as alleged in this action, namely that this action and the
4 action in the N.D. Ill. set forth claims under the Illinois Biometric Information Privacy Act arising
5 from the use of Amazon's Alexa-enabled devices and the recording of users' voices during the
6 operation of Alexa allegedly without their consent;

7 NOW, THEREFORE, in consideration of the foregoing, Plaintiff and Amazon agree and
8 hereby stipulate to:

9 Transfer this action to the United States District Court for the Northern District of Illinois.

10
11 Dated: July 30, 2021

Respectfully submitted,

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13 By: /s/ Brian D. Buckley

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23 *Attorneys for Defendants*

24 AMAZON.COM, INC. and

25 AMAZON.COM SERVICES, LLC

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Dated: July 30, 2021

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Attorneys for Plaintiff

[PROPOSED] ORDER

Having considered the Parties’ Stipulated Motion to Transfer Venue, the Court finds that venue is appropriate in the United States District Court for the Northern District of Illinois pursuant to 28 U.S.C. § 1404(a) and that transfer to that District will advance the convenience of the parties and witnesses, the interests of justice, and judicial economy because an additional action pending within the District is likely to concern substantially the same parties, property, transaction, or event as alleged in this action.

It is HEREBY ORDERED that:

1. The Stipulated Motion to Transfer Venue is GRANTED.
2. The Clerk of Court is directed to transfer this case to the United States District Court for the Northern District of Illinois under 28 U.S.C. § 1404(a).
3. All dates on this Court’s calendar for this action shall be withdrawn in light of the transfer.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 13th day of August 2021.



John C. Coughenour
UNITED STATES DISTRICT JUDGE

Presented by:

FENWICK & WEST LLP

By: /s/ Brian D. Buckley
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Attorney for Defendants

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2 AMAZON.COM SERVICES, LLC

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CERTIFICATE OF SERVICE

I hereby certify that, on July 30, 2021 I caused a true and correct copy of the foregoing to be filed in this Court’s CM/ECF system, which sent notification of such filing to counsel of record.

/s/ Brian D. Buckley
Brian D. Buckley, WSBA No. 26423
FENWICK & WEST LLP