

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

**CASE NO.: 2:23-cv-01495-JHC**

**STIPULATED MOTION AND  
ORDER TO FILE A CORRECTED  
REDACTED COPY OF EXHIBIT  
B**

NOTE ON MOTION CALENDAR:  
June 3, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below regarding Exhibit B to Plaintiffs' Motion to Compel Production of Documents Related to Spoliation.

In support of this request, the parties represent the following to the Court:

1. On May 31, 2024, the Court ordered that Exhibit B should be publicly filed with Plaintiffs' partial redactions of the document. (Dkt. #243).
2. The parties met and conferred on June 3, 2024. Amazon identified two additional instances where names should be redacted, and Plaintiffs agree that those

1 redactions are appropriate. Both of the names in question were redacted  
2 elsewhere in Plaintiffs' proposed redactions.

3 3. The parties stipulate as follows, subject to Court approval, and jointly request that  
4 the Court enter the following Order approving this Stipulation.

5 a. Plaintiffs are directed to file a public version of Exhibit B consistent with  
6 the Court's May 31, 2024 Order and the additional redactions described  
7 above.

8 Stipulated to and respectfully submitted this 3rd day of June, 2024, by:

9  
10 *s/ Kara King*

11 SUSAN A. MUSSER (DC Bar # 1531486)

12 EDWARD H. TAKASHIMA (DC Bar #  
1001641)

13 EMILY K. BOLLES (NY Reg. # 5408703)

14 KARA KING (DC Bar # 90004509)

ERIC ZEPP (NY Reg. #5538491)

Federal Trade Commission

600 Pennsylvania Avenue, NW

Washington, DC 20580

Tel.: (202) 326-2122 (Musser)

(202) 326-2464 (Takashima)

Email: smusser@ftc.gov

etakashima@ftc.gov

ebolles@ftc.gov

kking@ftc.gov

ezepp@ftc.gov

19  
20 *Attorneys for Plaintiff Federal Trade  
Commission*

21  
22  
23  
24 *s/ Michael Jo*

1 Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
2 New York State Office of the Attorney  
General  
3 28 Liberty Street  
New York, NY 10005  
4 Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
5 *Counsel for Plaintiff State of New York*

6 s/ Rahul A. Darwar  
Rahul A. Darwar (admitted *pro hac vice*)  
7 Assistant Attorney General  
Office of the Attorney General of Connecticut  
8 165 Capitol Avenue  
Hartford, CT 06016  
9 Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
10 *Counsel for Plaintiff State of Connecticut*

11 s/ Alexandra C. Sosnowski  
Alexandra C. Sosnowski (admitted *pro hac*  
12 *vice*)  
Assistant Attorney General  
13 Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
14 Office of the Attorney General  
One Granite Place South  
15 Concord, NH 03301  
Telephone: (603) 271-2678  
16 Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

17 s/ Caleb J. Smith  
18 Caleb J. Smith (admitted *pro hac vice*)  
Assistant Attorney General  
19 Consumer Protection Unit  
Office of the Oklahoma Attorney General  
20 15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
21 Telephone: (918) 581-2230  
Email: caleb.smith@oag.ok.gov  
22 *Counsel for Plaintiff State of Oklahoma*

23 s/ Timothy D. Smith  
24

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General  
Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

6 s/ Jennifer A. Thomson  
Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of*  
*Pennsylvania*

11 s/ Michael A. Undorf  
Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

17 s/ Christina M. Moylan  
Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

23 s/ Gary Honick  
24

1 Gary Honick (admitted *pro hac vice*)  
Assistant Attorney General  
2 Deputy Chief, Antitrust Division  
Office of the Maryland Attorney General  
3 200 St. Paul Place  
Baltimore, MD 21202  
4 Telephone: (410) 576-6474  
Email: Ghonick@oag.state.md.us  
5 *Counsel for Plaintiff State of Maryland*

6 s/ Michael Mackenzie  
Michael Mackenzie (admitted *pro hac vice*)  
7 Deputy Chief, Antitrust Division  
Office of the Massachusetts Attorney General  
8 One Ashburton Place, 18th Floor  
Boston, MA 02108  
9 Telephone: (617) 963-2369  
Email: michael.mackenzie@mass.gov  
10 *Counsel for Plaintiff Commonwealth of  
Massachusetts*

11 s/ Scott A. Mertens  
12 Scott A. Mertens (admitted *pro hac vice*)  
Assistant Attorney General  
13 Michigan Department of Attorney General  
525 West Ottawa Street  
14 Lansing, MI 48933  
Telephone: (517) 335-7622  
15 Email: MertensS@michigan.gov  
*Counsel for Plaintiff State of Michigan*

16 s/ Zach Biesanz  
17 Zach Biesanz (admitted *pro hac vice*)  
Senior Enforcement Counsel  
18 Office of the Minnesota Attorney General  
445 Minnesota Street, Suite 1400  
19 Saint Paul, MN 55101  
Telephone: (651) 757-1257  
20 Email: zach.biesanz@ag.state.mn.us  
*Counsel for Plaintiff State of Minnesota*

21  
22  
23 s/ Lucas J. Tucker  
24

Lucas J. Tucker (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Office of the Nevada Attorney General  
100 N. Carson St.  
Carson City, NV 89701  
Telephone: (775) 684-1100  
Email: LTucker@ag.nv.gov  
*Counsel for Plaintiff State of Nevada*

s/ Ana Atta-Alla  
Ana Atta-Alla (admitted *pro hac vice*)  
Deputy Attorney General  
New Jersey Office of the Attorney General  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Telephone: (973) 648-3070  
Email: Ana.Atta-Alla@law.njoag.gov  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera  
Jeffrey Herrera (admitted *pro hac vice*)  
Assistant Attorney General  
New Mexico Office of the Attorney General  
408 Galisteo St.  
Santa Fe, NM 87501  
Telephone: (505) 490-4878  
Email: jherrera@nmag.gov  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo-Almena  
Zulma Carrasquillo (admitted *pro hac vice*)  
Assistant Attorney General  
Antitrust Division  
Puerto Rico Department of Justice  
P.O. Box 9020192  
San Juan, Puerto Rico 00901-0192  
Telephone: (787) 721-2900  
Email: zcarrasquillo@justicia.pr.gov  
*Counsel for Plaintiff Commonwealth of Puerto  
Rico*

s/ Stephen N. Provazza

1 Stephen N. Provazza (admitted *pro hac vice*)  
Special Assistant Attorney General  
2 Chief, Consumer and Economic Justice Unit  
Department of the Attorney General  
3 150 South Main Street  
Providence, RI 02903  
4 Telephone: (401) 274-4400  
Email: sprovazza@riag.ri.gov  
5 *Counsel for Plaintiff State of Rhode Island*

6 s/ Sarah L.J. Aceves  
Sarah L. J. Aceves (admitted *pro hac vice*)  
7 Assistant Attorney General  
Public Protection Division  
8 Vermont Attorney General's Office  
109 State Street  
9 Montpelier, VT 05609  
Telephone: (802) 828-3170  
10 Email: sarah.aceves@vermont.gov  
*Counsel for Plaintiff State of Vermont*

11 s/ Laura E. McFarlane  
12 Laura E. McFarlane (admitted *pro hac vice*)  
Assistant Attorney General  
13 Wisconsin Department of Justice  
Post Office Box 7857  
14 Madison, WI 53707-7857  
Telephone: (608) 266-8911  
15 Email: mcfarlanele@doj.state.wi.us  
*Counsel for Plaintiff State of Wisconsin*

16  
17  
18  
19  
20  
21  
22  
23  
24

1 **MORGAN, LEWIS & BOCKIUS LLP**

2 By: s/ Patty A. Eakes

3 Patty A. Eakes, WSBA #18888

4 Molly A. Terwilliger, WSBA #28449

5 1301 Second Avenue, Suite 2800

6 Seattle, WA 98101

7 Phone: (206) 274-6400

8 Email: patti.eakes@morganlewis.com

9 molly.terwilliger@morganlewis.com

10 **WILLIAMS & CONNOLLY LLP**

11 Heidi K. Hubbard (*pro hac vice*)

12 John E. Schmidlein (*pro hac vice*)

13 Kevin M. Hodges (*pro hac vice*)

14 Jonathan B. Pitt (*pro hac vice*)

15 Carl R. Metz (*pro hac vice*)

16 Carol J. Pruski (*pro hac vice*)

17 Katherine Trefz (*pro hac vice*)

18 680 Maine Avenue SW

19 Washington, DC 20024

20 Phone: (202) 434-5000

21 Email: hhubbard@wc.com

22 khodges@wc.com

23 jpitt@wc.com

24 cmetz@wc.com

tbarnett@cov.com

kmitchelltombras@cov.com

17 **COVINGTON & BURLING LLP**

18 Thomas O. Barnett (*pro hac vice*)

19 Katherine Mitchell-Tombras (*pro hac vice*)

20 One CityCenter

21 850 Tenth Street, NW

22 Washington, DC 20001-4956

23 Phone: (202) 662-5407

24 Email: tbarnett@cov.com

kmitchelltombras@cov.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

**WILKINSON STEKLOFF LLP**

Kosta S. Stojilkovic (*pro hac vice*)  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Phone: (202) 847-4045  
Email: [kstojilkovic@wilkinsonstekloff.com](mailto:kstojilkovic@wilkinsonstekloff.com)

*Attorneys for Defendant Amazon.com, Inc.*

1 **ORDER**

2 IT IS SO ORDERED.

3 DATED this 4th day of June, 2024.

4 

5 JOHN H. CHUN  
6 UNITED STATES DISTRICT JUDGE

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24