

1 THE HONORABLE BARBARA J. ROTHSTEIN

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 WILBERT NAPOLEON, individually and on
11 behalf of all others similarly situated,

12 Plaintiff,

13 v.

14 AMAZON.COM, INC.,

15 Defendant.

Case No.: 2:24-CV-00186-BJR

**STIPULATED MOTION TO EXTEND
DEADLINES AND ORDER**

16 **STIPULATED MOTION**

17 Plaintiff Wilbert Napoleon and Defendant Amazon.com, Inc. hereby stipulate to extend the
18 deadlines to respond to the Complaint and initial discovery deadlines.

19 On February 9, 2024, Plaintiff filed his putative Class Action Complaint. Dkt. No. 1. On
20 February 15, 2024, Plaintiff served Defendant with the Complaint. Dkt. No. 16. On February 28,
21 2024, pursuant to the parties' stipulated motion to extend deadlines to amend and respond to
22 Complaint, the Court extended the time for Amazon to answer or otherwise respond to the
23 Complaint to March 28, 2024. Dkt. No. 18.

24 On March 12, 2024 and March 20, 2024, Amazon filed notices of related cases in this
25 action with respect to *Natalie Gianne et al. v. Amazon.com, Inc.*, Case No. 2:24-cv-00309-RSM,
26 assigned to the Honorable Ricardo S. Martinez, and *Timothy Peterson et al. v. Amazon.com, Inc.*,
27 Case No. 2:24-cv-00364-JHC, assigned to the Honorable John H. Chun. Dkt. Nos. 23 and 26.

1 On March 22, 2024, pursuant to the parties stipulated motion to extend deadlines, the Court
2 extended Amazon's deadline to respond to the Complaint, Plaintiff's deadline to amend the
3 Complaint, and the initial discovery deadlines. Dkt. No. 27.

4 Since then, Plaintiff's counsel has informed Amazon that they are conferring with
5 plaintiffs' counsel in the *Gianne* and *Peterson* cases regarding potential consolidation of those
6 actions with this action. In light of the parties' ongoing conferral regarding consolidation, the
7 parties agree and respectfully request that the Court extend the following deadlines for good cause:

8 Deadline for Rule 26(f) Conference	May 22, 2024
9 Deadline for Amazon to Respond to 10 the Complaint	May 29, 2024
11 12 Deadline for Plaintiff to Amend 13 Complaint, under Fed. R. Civ. P 14 15(a)	Either May 29, 2024; or 21 days after service of Amazon's responsive pleading or 21 days after service of Amazon's motion under Rule 12(b), (e), or (f), whichever is earlier
15 16 Initial Disclosures Pursuant to Rule 17 26(a)(1)	May 29, 2024
18 19 Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f)	June 5, 2024

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the parties,
21 and respectfully submitted for the Court's approval, that the above deadlines be reset as requested.

22 Dated: April 4, 2024

Respectfully submitted,

23 FENWICK & WEST LLP

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25 By: /s/ Brian D. Buckley

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By: /s/ Jonas B. Jacobson
Jonas B. Jacobson (*pro hac vice*)

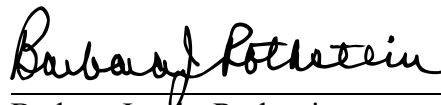
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Attorneys for Plaintiff Wilbert Napoleon

IT IS SO ORDERED.

DATED this 9th day of April, 2024.



Barbara Jacobs Rothstein
U.S. District Court Judge

Presented by:
FENWICK & WEST LLP

By: /s/ Brian D. Buckley
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