

UNITED STATES OF AMERICA
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of)

AMAZON.COM, INC.)

Respondent.)

CPSC DOCKET NO.: 21-2

JOINT REQUEST FOR DISCOVERY EXTENSION

Respondent Amazon.com, Inc. and Complaint Counsel (together, the “Parties”) hereby jointly request an alteration of the schedule set forth in the Order on Motion to Dismiss and Motion for Summary Decision (Doc. No. 27 at page 28) entered by the Presiding Officer.

The Parties have been diligently engaged in discovery, including negotiation of the April 26, 2022 Stipulation of the Parties provided to the Presiding Officer (Doc. Nos. 35, 37), multiple rounds of production of documents, production of objections and responses to interrogatories and requests for admissions, and multiple meet-and-confer sessions to discuss discovery-related issues. However, additional time is needed for the Parties to complete follow-up document productions, for Complaint Counsel to complete expert rebuttal disclosures,¹ for either side to raise any necessary discovery disputes to the Presiding Officer for resolution, and for both sides to schedule and conduct depositions.

Accordingly, the Parties respectfully propose the following alteration to the schedule:

July 15, 2022: Expert Rebuttal Disclosures;

¹ On May 9, 2022, in accordance with the schedule set by the Presiding Officer and by Fed. R. Civ. P. 26(a)(2) (as adopted by the Order at Doc. No. 27 at page 28), Respondent served an expert report and accompanying material of its principal expert.

September 29, 2022: Discovery Cutoff;
October 21, 2022: Deadline for filing of Motions for Summary Decision;
November 18, 2022: Deadline for filing Oppositions to Motions for Summary Decision;
December 16, 2022: Deadline for filing Replies in Support of Motions for Summary Decision.

Dated this 31st day of May, 2022

Respectfully submitted,



John C. Eustice, Senior Trial Attorney
Liana G.T. Wolf, Trial Attorney
Serena Anand, Trial Attorney

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Counsel for Respondent Amazon.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2022, a copy of the foregoing was served upon all parties and participants of record in these proceedings as follows:

Alberta E. Mills
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By email to Counsel for Respondent:

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