

# Exhibit 106

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

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In the Matter of )  
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AMAZON.COM, INC. )  
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Respondent. )  
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CPSC DOCKET NO.: 21-2

**NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE(S) FOR  
RESPONDENT AMAZON.COM, INC.**

PLEASE TAKE NOTICE that, consistent with the parties' agreement memorialized in their Joint Letter in Response to October 19, 2021 Order (dated November 12, 2021) in which the parties agreed that Federal Rule of Civil Procedure 30 governs depositions by oral examination, and pursuant to Federal Rule of Civil Procedure 30(b)(6), Complaint Counsel will take the deposition upon oral examination, for use in discovery and at hearing, of the following persons on the date and at the time indicated below before a person duly authorized to administer an oath under Maryland law.

The deposition will be recorded via stenographic, audio, and/or videotaped means for the purpose of discovery and/or used as evidence and/or any other purposes permitted by the Part 1025 Rules of Practice for Adjudicative Proceedings codified in the Code of Federal Regulations, including use at hearing, and will continue day to day until completed. Respondent Amazon.com, Inc. shall produce a corporate representative(s) with the knowledge and ability to testify regarding the topics described in the attached "Schedule A."

In addition, Respondent's corporate representative(s) will bring to the deposition the documents/things listed in the "Schedule A." You are advised that you must designate one or more officers, directors, managing agents, or other persons who will testify on your behalf

regarding the matters listed in “Schedule A” which are known or reasonably available to Amazon.com, Inc.

**DEPONENT:** Amazon.com, Inc.

**DATE:** July 13, 2022

**TIME:** 10:00 a.m. EST

**LOCATION:** U.S. Consumer Product Safety Commission, 4330 East-West Highway,  
Bethesda, MD 20814



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

Division of Enforcement and Litigation  
Office of Compliance and Field Operations  
U.S. Consumer Product Safety Commission  
Bethesda, MD 20814  
Tel: (301) 504-7809

*Complaint Counsel for  
U.S. Consumer Product Safety Commission*

Date: June 15, 2022

## **SCHEDULE A**<sup>1</sup>

List of topics for Amazon.com, Inc. representative(s):

1. Respondent Amazon.com, Inc.'s policies, procedures, and practices for notifying consumers who purchase products on amazon.com of any potential safety hazards posed by those products, including, but not limited to, issuing refunds or any other remedy to such consumers.
2. Respondent Amazon.com, Inc.'s policies, procedures, and practices for handling products that have been identified as presenting a potential safety hazard, including, but not limited to, products in inventory, in transit, and with consumers.
3. Respondent Amazon.com, Inc.'s actions with regards to the Subject Products, including the identification of any risks posed by the Subject Products and actions taken in addressing those risks.
4. Respondent Amazon.com, Inc.'s internal deliberations regarding the actions that Respondent did and did not take with regards to the Subject Products.
5. Respondent Amazon.com, Inc.'s notices to consumers who purchased the Subject Products.
6. Respondent Amazon.com, Inc.'s handling of the inventory of the Subject Products, including tracking the returns and destruction of any inventory of the Subject Products.
7. Respondent Amazon.com, Inc.'s process for issuing gift cards and/or refunds to consumers who purchased the Subject Products, including whether and how the entity that listed the Subject Product for sale on Amazon.com reimbursed Amazon for the gift

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<sup>1</sup> Please refer to Complaint Counsel's First Set of Interrogatories to Respondent for definitions.

cards, refunds, or any other aspect of Respondent Amazon.com, Inc.'s actions with regards to the Subject Products.

8. Respondent Amazon.com, Inc.'s communications and agreements with the entities that listed the Subject Products for sale on Amazon.com.
9. Respondent Amazon.com, Inc.'s actions relating to the Subject Products after sending notices to consumers who purchased the Subject Products, including, but not limited to, confirming that consumers reviewed the notices, confirming that consumers took action after reviewing the notice, or tracking contacts from consumers about the notice.
10. Any internal deliberations and/or actions taken by Respondent Amazon.com, Inc. to search for or identify any functionally equivalent products to the Subject Products.<sup>2</sup>
11. Identification of any functionally equivalent products to the Subject Products and Respondent Amazon.com, Inc.'s actions taken with regards to functionally equivalent products to the Subject Products.
12. All documents relating to Topic Nos. 1 through 11 that have not yet been produced by Respondent Amazon.com, Inc. in this litigation.

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<sup>2</sup> For the purposes of this deposition, "functionally equivalent products" means products that appear the same as the Subject Products outside of cosmetic differences (i.e., color, size) and present the same hazard.