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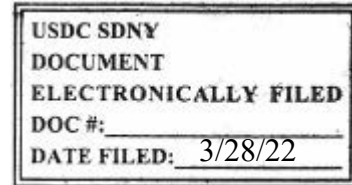
# REESE LLP

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March 25, 2022

**VIA ECF**

Judge Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007



**RE: *Baron, et al. v. Amazon.com, Inc.*,  
No. 1:21-cv-9636-AJN-SN**

Dear Judge Nathan:

Plaintiffs Mary Baron, Calhea Johnson, Malika McLean, and Tony Watson (“Plaintiffs”) and Defendant Amazon.com, Inc. (“Amazon”) (collectively, the “Parties”) have met and conferred about the above-captioned action. The Parties have also met and conferred concerning *Caudel, et al. v. Amazon.com, Inc.*, No. 2:20-cv-848, pending in the U.S. District Court for the Eastern District of California (the “*Caudel* Action”). The *Caudel* Action concerns the same subject matter as the instant matter, and the Parties have retained the same counsel in both actions.

The Parties have met and conferred as to measures to coordinate the two actions in order to conserve judicial resources and for the convenience of the Parties. The Parties agreed that stipulating to and requesting transfer of the instant action and the *Caudel* Action to the U.S. District Court for the Western District of Washington, where Amazon resides, would further those goals.

Specifically, the Parties agreed that transfer would promote convenience for the Parties and witnesses by allowing both matters to be heard in one forum and would conserve judicial and party resources by eliminating motion practice related to the forum-selection clause in Amazon’s Conditions of Use. By entering into this stipulation, neither Party waives any claims, defenses, or arguments as to Amazon’s Conditions of Use, including as to whether or how the Conditions of Use bear on Plaintiffs’ claims.

On February 24, 2022, the Parties jointly requested a thirty (30) day extension of time for Amazon to respond to the Complaint (Dkt. No. 7), during which time the Parties expected to finalize and file the aforementioned stipulation requesting transfer. The next day this Court entered an order granting the stipulated extension of time and ordering that Amazon’s response to the Complaint be filed no later than March 28, 2022 (Dkt. No. 8). The Parties jointly requested and received similar relief in the *Caudel* Action. *Caudel, et al. v. Amazon.com, Inc.*, No. 2:20-cv-848 (Dkt. No. 44) (Feb. 25, 2022).

With this Letter-Motion and consistent with the Parties' stipulation, the Parties jointly request transfer of the instant action to the U.S. District Court for the Western District of Washington.

On March 22, 2022, the parties in the *Caudel* Action jointly requested the same relief in that case. Upon transfer to the Western District of Washington of the instant action by this Court and of the *Caudel* Action by the Eastern District of California, the Parties will meet and confer regarding potential consolidation of the actions, a consolidated amended complaint, and a proposed schedule for responding to any amended complaint.

Accordingly, the parties HEREBY STIPULATE and request that the Court transfer this action to the U.S. District Court for the Western District of Washington.

DATED: March 25, 2022

Respectfully submitted,

By:

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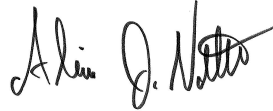
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*Attorneys for Defendant*  
*Amazon.com, Inc.*

~~[PROPOSED ORDER]~~

**IT IS SO ORDERED.**

DATED: 3/28/22



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Honorable Alison J. Nathan  
United States District Judge