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THE HONORABLE JOHN H. CHUN

**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

**PLAINTIFFS' REPLY IN
SUPPORT OF MOTION TO
COMPEL DOCUMENTS
RELATED TO SPOLIATION**

1 **INTRODUCTION**

2 Amazon asks the Court to believe the unbelievable. Amazon claims there is “no evidence
3 . . . that Amazon personnel used Signal to discuss the business practices at issue in this case.”
4 Opp. at 1. Yet Amazon’s top executives—including its ultimate decisionmakers and the
5 architects of the conduct at issue—used disappearing messages on Signal as a side channel to
6 discuss Amazon’s business throughout Plaintiffs’ pre-Complaint investigation. Mot. at 2-3.
7 When Amazon eventually imaged select Signal users’ phones, it took over 2,900 screenshots
8 showing more than 300 instances where disappearing messages were enabled or the timer setting
9 was changed after Amazon was on notice of Plaintiffs’ investigation. Opp. at 6, Ex. B.

10 There are two explanations for the record before the Court. The first is that Amazon’s top
11 executives used disappearing messages to discuss matters relevant to this action, among other
12 business; they continued to do so after Amazon was on notice of Plaintiffs’ investigation; and
13 Amazon failed to preserve this evidence. Amazon’s alternative explanation is that although
14 senior leadership used Signal to discuss work-related matters for over two and half years, they
15 somehow never used disappearing messages to discuss anything relevant to this action. Only one
16 of these explanations is plausible.

17 There is nothing inherently problematic about using Signal, but a company’s choice to
18 use Signal does not alter the company’s document preservation obligations during a government
19 investigation or enforcement action. Like any other company document, Amazon was required to
20 preserve potentially relevant Signal messages, including by instructing its employees to disable
21 disappearing messages. *See Distributions, LLC v. 21 Century Smoking, Inc.*, 513 F. Supp. 3d 839,
22 977-79 (N.D. Ill. 2021) (“[D]isabling an autodeletion function is universally understood to be
23 one of the most basic and simple functions a party must do to preserve ESI.”).

1 Plaintiffs seek Amazon’s preservation notices and instructions to understand whether
2 Amazon adequately and timely instructed its employees to preserve Signal messages, which is
3 directly relevant to the legal standard for spoliation. Mot. at 11. Amazon is withholding these
4 documents as privileged, but Plaintiffs’ Motion establishes a preliminary showing of spoliation
5 that overcomes Amazon’s privilege claims, and Plaintiffs’ concerns cannot be addressed through
6 other means. Accordingly, the Court should order Amazon to produce all documents responsive
7 to RFP Nos. 25 and 27.

8 **ARGUMENT**

9 **I. PLAINTIFFS HAVE MADE A PRELIMINARY SHOWING OF SPOLIATION.**

10 Plaintiffs established a preliminary showing of spoliation in two independent ways.

11 *First*, Plaintiffs established that Amazon destroyed potentially relevant documents. *See Al*
12 *Otro Lado, Inc. v. Wolf*, 2020 WL 4432026, at *2 (S.D. Cal. July 31, 2020); *United States v.*
13 *Cnty. Health Network, Inc.*, 2023 WL 4761664, at *5 (S.D. Ind. July 26, 2023). Amazon argues
14 that Plaintiffs were required to cite specific non-deleted Signal messages that are directly
15 material to Plaintiffs’ claims, *see* Opp. at 9-11, but that is incorrect. The law requires only
16 “reason for concern that evidence has been lost.” *Agne v. Papa John’s Int’l, Inc.*, 2012 WL
17 12882903, at *3 (W.D. Wash. Feb. 6, 2012).

18 Even without considering any screenshots of non-deleted messages, the undisputed
19 record and case law support a preliminary showing of spoliation. It is undisputed that some
20 Amazon executives who used disappearing messages were “involved in the acts and decisions
21 underlying” Plaintiffs’ claims. Mot. at 2, 8; *see Cnty. Health Network*, 2023 WL 4761664, at *5.
22 It is undisputed that those executives deleted Signal messages, depriving Plaintiffs and the Court
23 of the ability to examine their contents. Ex. B; *see Al Otro Lado*, 2020 WL 4432026, at *2
24

1 (“Because [a witness’s] notes were destroyed, it is impossible for the Court to say whether
2 defendants’ subjective characterization of the notes as ‘shorthand, non-substantive notes’ that did
3 not contain information relevant to this case is correct.”). It is undisputed that those executives
4 continued to delete Signal messages after Amazon received a preservation letter, after Amazon
5 received a voluntary access letter, and after Amazon received a Civil Investigative Demand. Mot.
6 at 8. Indeed, it is undisputed that Amazon executives kept deleting Signal messages after
7 Amazon issued legal holds to them and after Amazon issued guidance about Signal in October
8 2020 and August 2021 (the details of which Amazon has withheld or redacted on privilege
9 grounds). *Compare* Ex. B with Ex. D at 3-5 and Ex. M. From these facts, the Court can
10 reasonably infer that Amazon destroyed potentially relevant documents and should conclude that
11 Plaintiffs have made a preliminary showing of spoliation.

12 The three examples of Signal messages in Plaintiffs’ Motion show that Amazon
13 executives used Signal to discuss antitrust issues and for substantive business purposes, which is
14 further reason for concern that evidence has been lost. The exchange between Peter Krawiec and
15 Carlo Bertucci started two days after Mr. Krawiec received an email titled “Re: Congressional
16 and FTC investigations into Amazon.” Exs. H, S. Amazon claims the email has “nothing to do
17 with” Plaintiffs’ investigation, Opp. at 9, but that cannot be verified, because Amazon has
18 withheld the email in its entirety. Ex. S. Regardless, the email’s subject line also refers to a
19 Congressional investigation, and it was sent days after the House Judiciary Committee issued a
20 Request for Information to Amazon while investigating anticompetitive conduct.¹ Even if the
21 September 2019 exchange between Mr. Krawiec and Mr. Bertucci concerned a Congressional

22
23 ¹ See Request for Information to Amazon, H. Comm. on the Judiciary, 116th Cong. (Sept. 13, 2019),
24 <https://democrats-judiciary.house.gov/sites/democrats.judiciary.house.gov/files/documents/amazon%20rfi%20-%20signed.pdf>.

1 investigation rather than the FTC's investigation, it would support the conclusion that Amazon
2 executives were deleting messages related to antitrust enforcement. *See* Exs. H, S.² So would the
3 later August 2020 exchange, in which Mr. Bertucci sent a news article discussing antitrust
4 enforcement against technology companies and Mr. Krawiec turned on disappearing messages.
5 Exs. H, 18.

6 The other two examples cited by Plaintiffs show that Amazon executives were using
7 Signal to discuss substantive business issues: one is a chat between former CEO of Worldwide
8 Operations Dave Clark and Jeff Bezos discussing a contract with the U.S. Postal Service, Ex. I,
9 and the other is a message to Mr. Bezos from Drew Herdener, then Vice President for Global
10 Communications,³ about press coverage of Amazon barring competing device makers from
11 buying advertising on Amazon's online superstore. Exs. J, 19.

12 Plaintiffs' preliminary showing of spoliation is not speculative, unlike *Little Hocking*
13 *Water Ass'n, Inc. v. E.I. du Pont de Nemours & Co.*, 2013 WL 5311292 (S.D. Ohio 2013). In
14 that case, the plaintiff relied solely on gaps in the defendant's data production and some
15 ambiguous 30(b)(6) testimony to argue that the court should infer data had been deleted, which
16 the defendant disputed. *See id.* at 1-3. The court did not find a preliminary showing of spoliation
17 on those facts, and instead directed the defendant to explain whether it could produce the
18 requested data. *See id.* at 4-5. Here, there is no question that Amazon destroyed Signal messages
19 during Plaintiffs' investigation. *See* Ex. B.

20 ***Second***, Plaintiffs established a preliminary showing of spoliation by showing that
21 Amazon did not take timely steps to adequately preserve Signal messages. *See Al Otro Lado*,

23 ² Mr. Bertucci also deleted the Signal app (and all stored messages) from his phone after he received a document
24 preservation notice for Plaintiffs' pre-Complaint investigation. *See* Ex. D at 6, Ex. 14 at 4-5.

³ Drew Herdener, LinkedIn, <https://www.linkedin.com/in/drew-herdener-3620b51> (last visited May 23, 2024).

1 2020 WL 4432026, at *2. Amazon was required to preserve potentially relevant information
2 after receiving the FTC’s preservation letter. *See, e.g., Su v. United States Postal Serv.*, 2024 WL
3 21670, at *5 (W.D. Wash. Jan. 2, 2024) (letter notifying defendant of government investigation
4 “triggered [defendant’s] duty to preserve potentially relevant evidence”); *FTC v. F&G Int’l Grp.*
5 *Holdings, LLC*, 339 F.R.D. 325, 330-31 (S.D. Ga. 2021) (similar). Amazon knew its executives
6 were using Signal, given that Amazon’s General Counsel had been using Signal to communicate
7 with other Amazon executives since April 2019. Ex. B at 3. Despite that, Amazon is vague about
8 when it claims its counsel first learned that Amazon executives used Signal for work-related
9 communications. *See Opp.* at 4-5. If Amazon had conducted timely custodial interviews with any
10 of the Signal users who Amazon placed under a legal hold, it would have identified the need to
11 preserve Signal messages. But Amazon chose to delay even basic preservation due diligence
12 until a year later. *See Ex. D* at 9-10; *Opp.* at 4.

13 Amazon cannot reasonably claim it believed documents held by its founder and CEO
14 were not relevant to a government investigation into “whether [Amazon] has engaged or is
15 engaging in unfair methods of competition, through anticompetitive or exclusionary conduct
16 related to online retail sales and distribution.” Ex. K at 1; *see Knickerbocker v. Corinthian Colls.*,
17 298 F.R.D. 670, 678 (W.D. Wash. 2014) (duty to preserve extends to “documents in the
18 possession of employees who are ‘key players’ in the case.”). Amazon understood the scope of
19 Plaintiffs’ investigation well enough to issue preservation notices to more than 100 other
20 employees, *see Ex. D* at 5-9, and the broad scope of the investigation made it more likely, not
21 less, that the company’s ultimate decisionmaker would have potentially relevant information.⁴

22 _____
23 ⁴ Amazon represents that Mr. Bezos was subject to legal holds for other matters before he received a hold for
24 Plaintiffs’ investigation. *Opp.* at 11. If Amazon took steps to preserve Mr. Bezos’ Signal messages for other matters
but not here, that highlights Amazon’s failure to act in this case. If Amazon did not take steps to preserve Signal
messages for other matters, Amazon’s failure to meet its preservation obligations may extend beyond this case.

1 All told, Amazon likely destroyed evidence by neglecting to interview hold recipients until over
2 a year after it was on notice of Plaintiffs' investigation, neglecting to issue a legal hold to Mr.
3 Bezos until April 2020, and not taking timely steps to preserve Signal messages. This establishes
4 a preliminary showing of spoliation. *See, e.g., In re Cathode Ray Tube Antitrust Litig.*, 2023 WL
5 5667882, at *3 (N.D. Cal. Jan. 27, 2023); *Al Otro Lado*, 2020 WL 4432026, at *2.

6 As an aside, Amazon suggests its Signal deletions are unimportant because it produced
7 documents from other sources. *See Opp.* at 3, 14. A defendant's "contentions that plaintiffs have
8 more than enough discovery to litigate this case" are "simply irrelevant to the issue now before
9 the Court, which is whether [defendant's] hold letters should be produced in discovery." *Thomas*
10 *v. Cricket Wireless, LLC*, 2021 WL 1017114, at *5 n.5 (N.D. Cal. Mar. 16, 2021). And candid
11 messages from a secure backchannel between executives may be particularly relevant. *See Pable*
12 *v. Chicago Transit Auth.*, 2023 WL 2333414 at *24 (N.D. Ill. Mar. 2, 2023) ("[R]eal-time,
13 unguarded communications . . . utilizing an unsanctioned, end-to-end encrypted messaging
14 application are irreplaceable.").

15 **II. THE COURT SHOULD ORDER AMAZON TO PRODUCE ITS** 16 **PRESERVATION NOTICES AND INSTRUCTIONS.**

17 Amazon argues that it should not have to produce its preservation notices and instructions
18 even if Plaintiffs make a preliminary showing of spoliation, but the case law Amazon cites is
19 either inapplicable or supports Plaintiffs. *Shenwick* and *Allen* did not involve a preliminary
20 showing of spoliation. *Shenwick v. Twitter, Inc.*, 2018 WL 833085, at *4 (N.D. Cal. Feb. 7,
21 2018); *Allen v. Purss*, 2022 WL 17733679, at *5 (D. Or. Dec. 16, 2022). The *Raynor*,
22 *MedImpact Healthcare*, and *United Illuminated* courts found that the movants did not make a
23 preliminary showing of spoliation, unlike here, and are further distinguishable. In *Raynor v.*
24 *District of Columbia*, the only basis for the plaintiff's motion was the defendant's failure to

1 produce “a handful of documents.” 2020 WL 13603997, at *1-2 (D.D.C. May 6, 2020). In
2 *MedImpact Healthcare Sys. v. IQVIA, Inc.*, the primary basis for the defendants’ motion was the
3 plaintiffs’ failure to produce six emails, the contents of which were “contained within larger
4 email chains” in defendants’ possession. 2022 WL 1694428, at *3 (S.D. Cal. May 26, 2022).
5 And in *United Illuminating v. Whiting-Turning Contracting Co.*, the moving party agreed that
6 “the names of the [hold] recipients would certainly be . . . meaningful on their own” during oral
7 argument and failed to establish why the contents of the holds would be significant. Tr. at 36-39,
8 No. 18-cv-327 (D. Conn. Oct. 29, 2020), Dkt. #272.

9 *Cricket Wireless* supports Plaintiffs’ position. As Amazon notes, the court initially denied
10 a motion to compel the production of legal holds, instead requiring a 30(b)(6) deposition about
11 the defendant’s preservation efforts. 2020 WL 7344742, at *2-3 (N.D. Cal. Dec. 14, 2020). But
12 the plaintiffs later renewed their motion, alleging that the defendant’s “witnesses either did not
13 know, or were counseled not to answer, basic questions about what kinds and categories of
14 information and documents were covered by the subject hold letters . . . and what specific actions
15 Cricket employees were instructed to take regarding collection and preservation[.]” 2021 WL
16 1017114, at *4 (N.D. Cal. Mar. 16, 2021). The court granted that motion. *Id.* at *6. Plaintiffs
17 have already sought corporate testimony on Amazon’s preservation efforts; Amazon asserted
18 privilege over and deliberately did not prepare its witness to answer questions about the contents
19 of its legal holds. *See* Ex. O at 109:25-110:22, 111:18-112:15. Following *Cricket Wireless*, the
20 Court should grant Plaintiffs’ Motion.

21 The only case Amazon cites where a court found a preliminary showing of spoliation but
22 did not order the production of preservation notices is *Community Health Network*. 2023 WL
23 4761664 at *10-11. The court denied the relator’s motion to compel because the issue in that
24

1 case was the defendant’s “failure to issue any litigation hold whatsoever—written or otherwise—
2 to certain custodians,” rather than the “scope or effectiveness of the hold notices.” *Id.* at *10.
3 Here, the contents of Amazon’s preservation notices and instructions are the only way to answer
4 key questions about whether Amazon took reasonable steps to preserve Signal messages,
5 including whether Amazon directed employees to stop using disappearing messages and whether
6 Amazon took any further preservation steps when its employees continued to do so.

7 **III. IN CAMERA REVIEW IS NOT A SUBSTITUTE FOR THE PRODUCTION OF
8 AMAZON’S PRESERVATION NOTICES AND INSTRUCTIONS.**

9 Amazon suggests an *in camera* review as an alternative to producing responsive
10 documents. *See Opp.* at 14-15. Amazon is mischaracterizing the type of *in camera* review some
11 courts have employed in cases like this. In all three of the cases cited by Amazon, the court
12 reviewed documents *in camera* to screen out any privileged material that did not relate to
13 preservation issues, and then ordered the production of preservation-related materials. *See*
14 *Cricket Wireless*, 2021 WL 1017114, at *6; Order Approving Special Master’s Report &
15 Recommendation at 2, *Cathode Ray Tube Antitrust*, No. 4:07-cv-5944-JST (N.D. Cal. Feb. 24,
16 2023), Dkt. #6166; *Al Otro Lado*, 2020 WL 4432026, at *3. Plaintiffs have no objection to an *in*
17 *camera* review consistent with those cases.

18 **CONCLUSION**

19 The Court should grant Plaintiffs’ Motion and order Amazon to produce all documents
20 responsive to RFP Nos. 25 and 27.
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1 Dated: May 23, 2024

I certify that this brief contains 2,473 words, in compliance with LCR 7(e)(4), LCR 7(f)(4), and the Court's May 9, 2024 Order.

2
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