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ELECTRONICALLY  
**FILED**  
Superior Court of California,  
County of San Francisco

**07/14/2023**  
Clerk of the Court  
BY: JUDITH NUNEZ  
Deputy Clerk

**Exempt from Filing Fees Pursuant  
to Government Code § 6103**

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF SAN FRANCISCO**

14 **THE PEOPLE OF THE STATE OF**  
15 **CALIFORNIA,**  
16 Plaintiff,  
17 v.  
18 **AMAZON.COM, INC.,**  
19 Defendant.

21 **AMAZON.COM, INC.,**  
22 Cross-Complainant,  
23 v.  
24 **THE PEOPLE OF THE STATE OF**  
25 **CALIFORNIA,**  
26 Cross-Defendant.

**Case No. CGC-22-601826**

**PLAINTIFF AND CROSS-DEFENDANT  
THE PEOPLE OF THE STATE OF  
CALIFORNIA'S REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF ITS  
DEMURRER TO AMAZON.COM, INC.'S  
CROSS-COMPLAINT**

Cross-Complaint Filed: May 30, 2023  
Department: 304  
Judge: Hon. Ethan P. Schulman  
Hearing Date: October 4, 2023  
Hearing Time: 1:30pm

1 **REQUEST FOR JUDICIAL NOTICE**

2 Pursuant to California Evidence Code, section 452, Plaintiff and Cross-Defendant The  
3 People of the State of California (“the People”) request that the Court take judicial notice of the  
4 public version complaint filed by the Federal Trade Commission against Amazon, Inc. in the  
5 Western District of Washington, on June 21, 2023 (“the FTC Complaint”), which is attached to  
6 the Declaration of Robert B. McNary in support of the People’s Demurrer and Request for  
7 Judicial Notice.

8 The People seek judicial notice of the FTC Complaint not for the truth of its content, but  
9 for the fact that the suit was filed. Under Evidence Code section 452(d), the Court may take  
10 judicial notice of any records of any court of record of the United States. (*Meridian Financial*  
11 *Services, Inc. v. Phan* (2021) 67 Cal.App.5th 657, 673.) Because the fact that the Federal Trade  
12 Commission has filed suit against Amazon in the Western District of Washington is not  
13 reasonably subject to dispute and is capable of immediate and accurate determination, the People  
14 request that the Court take judicial notice of the FTC Complaint.

15 Dated: July 14, 2023

**THE PEOPLE OF THE STATE OF CALIFORNIA**

17 By: /s/ Robert B. McNary

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