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ELECTRONICALLY
FILED
Superior Court of California,
County of San Francisco

07/17/2023
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 6, 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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