

~~UNITED STATES OF AMERICA~~  
**BEFORE FEDERAL TRADE COMMISSION**

in opposition to Complaint Counsel's Motion for Partial Summary Decision ("Motion")

as submitted by Respondents' legal counsel to show, among other things, that the Commission's proposed course of action is not in the public interest.

Respondents have obtained no discovery from Complaint Counsel. No violation of the Federal Trade Commission Act, 15 U.S.C. § 57(a), has been proven.

Respondents' counsel has reviewed the Commission's proposed course of action and has concluded that it is not in the public interest.

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Complaint Counsel, Matthew Gold about the Discovery and  
he undersigned was on September 27, 2000 in this case. Complaint Counsel knew that

new to the case and unfamiliar with the facts alleged in the Complaint. Nevertheless,

was a matter of course in the course of the discovery process.

Under the Amended Order was entered on December 11, 2000. Under the

Under the Amended Discovery and Trial Schedule Order, discovery closes





the exhibits and rule, as a matter of law, as to what the documents represent. Motion reads:

...wing as to what the exhibits mean.

...sho

...Motion is devoid of any claim that any expert, either

...the exhibits. As noted above, the

...a. concurs in Complaint Counsel's reading of the

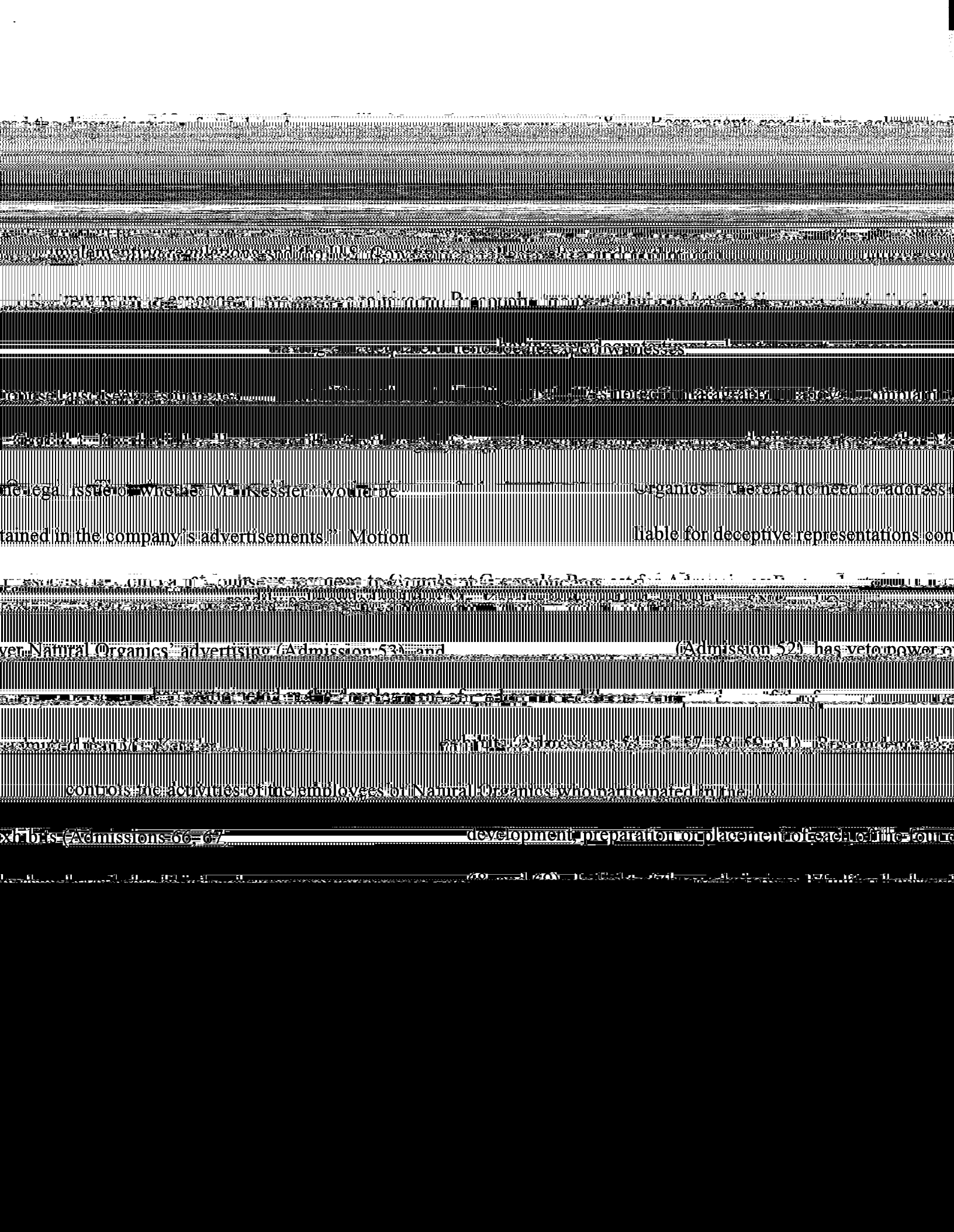
...within or outside the Commission

...exhibits.

...sel do not argue that their interpretation of these exhibits is

...15 Complaint Coun





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COMMISSION

UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION

In the Matter of )  
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In

NATIONAL ORGANIZATIONS

a corporation, and

DOCKET NO 9294

GERALD A. KRASSER

individually and as an officer

of the corporation.

STATE OF CALIFORNIA

County of Los Angeles

NOTED BY THE SECRETARY OF THE FEDERAL TRADE COMMISSION

