

UNITED STATES OF AMERICA

FEDERAL TRADE COMMISSION

II.

Complaint Counsel moved to strike the additional 1.6 million in December 1991

[REDACTED]

Fifth Amendment Due Process

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# First Amendment

This is a copy of the First Amendment to the United States Constitution.

That the Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof, or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of their grievances.

be reviewed by the courts. Once the Commission has resolved these questions and issued a complaint, the issue to be litigated is not the adequacy of the Commission's pre-complaint information or the diligence of its study of the material in question.

*In re Exxon Corp.*, 83 F.T.C. 1759, 1760 (1974). The Commission's reason to believe and public

agency action pled by each of the Respondents is **DENIED**.

**APA Unreasonable Delay**

Complaint Council moves to strike Respondent's 1/16/2014 APA. Council's 1/16/2014

The equitable defenses of laches and equitable estoppel generally cannot be asserted against the government when the government is acting in the public interest. *United States v. Summerlin*, 310 U.S. 414, 416 (1939); *United States v. Phillip Morris Inc.*, 300 F. Supp.2d 61, 65

Supp. 2d at 70-71 n.17. Defendants' Motion for Dismissal is DENIED.

The parties are reminded that allowing these defenses is not an open invitation to

needlessly confuse and compound the issues.