

questions of law.” *In re Basic Research*, 2004 FTC LEXIS 225, *5 (Nov. 30, 2004) (citation omitted). As a result, Respondent’s Requests that seek admissions of contested legal and factual issues central to the case are improper. In addition, some of Respondent’s Requests seek legal conclusions or irrelevant matter that is beyond the proper scope of requests for admission in this matter under Rule 2.22. In several of these instances, the Requests specifically begin with “and

RESPONSE: Complaint Counsel incorporates its General Objections in its response to this

