

PUBLIC DOCUMENT

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



“ETC. A. . . .”

ADMISSION REQUESTS

Complaint Council requests the following admissions:

[REDACTED]

14. ECM does not possess or rely on any consumer perception evidence supporting how ECM's customers or end-use consumers interpret a "reasonable" period of time for complete biodegradation.
15. ECM does not possess or rely on any consumer perception evidence supporting how ECM's customers or end-use consumers interpret the phrase "some period greater than one year."
16. ASTM test protocols do not permit extrapolation of the results of ASTM tests to prove complete Biodegradation.

**ADDITIONAL REQUESTS FOR ADMISSION FOR THE PURPOSES OF
AUTHENTICITY AND ADMISSIBILITY OF EXHIBITS**

Pursuant to the Court's Scheduling Order the following *Requests for the Purposes of*

Authenticity and Admissibility of Exhibits do not count against Complainant Counsel's numeric

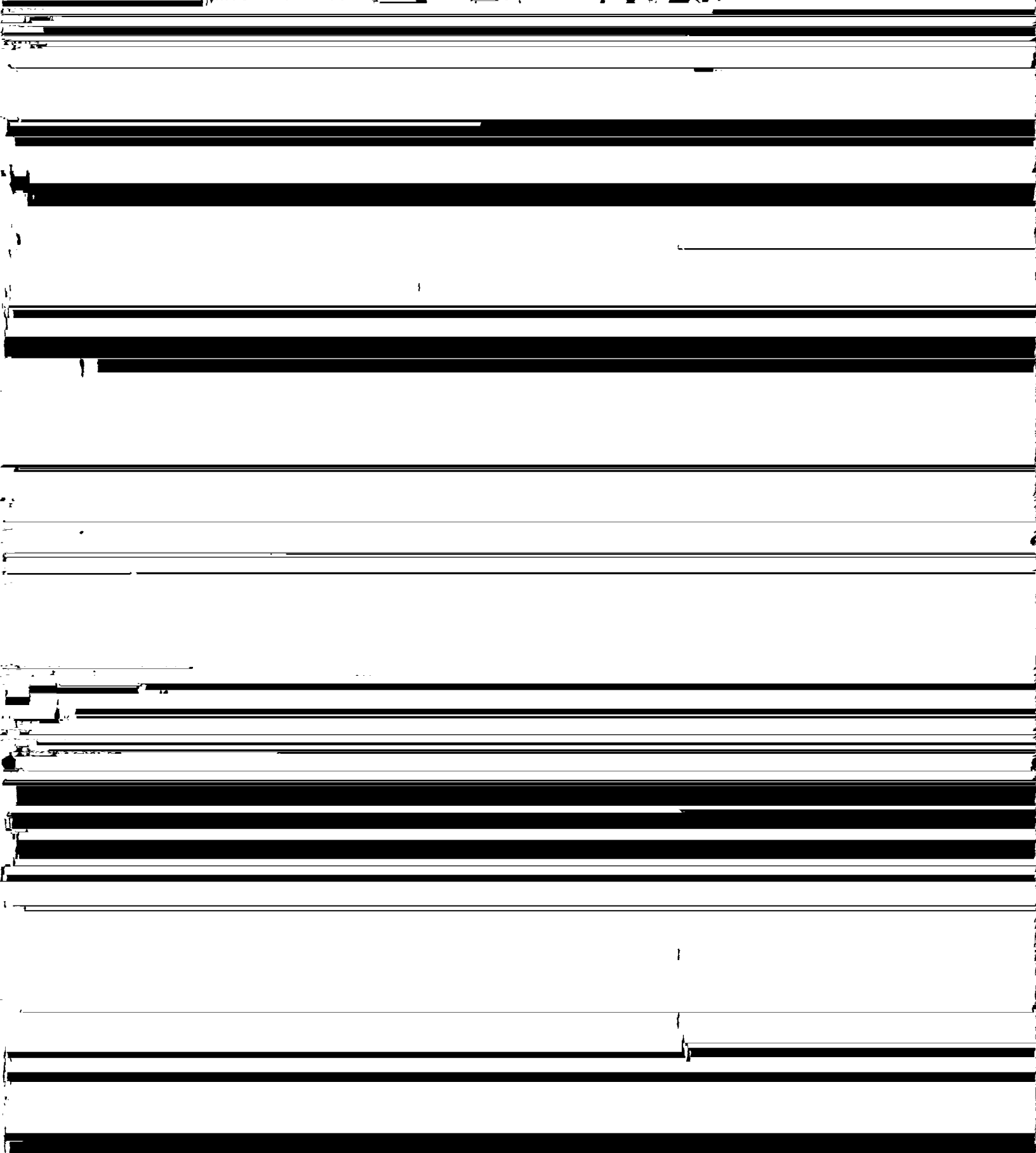
limit on Requests for Admissions. See Scheduling Order at 6.

1 Exhibit CX 00001 attached hereto is authentic, genuine, and a true and correct copy of

[REDACTED] produced by ECM in response to the FTC Access Letter with

[REDACTED]

copy of this document with beginning Bates number ECM-FTC-000301. Exhibit CX-



CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2013, I caused a true and correct copy of the foregoing Complaint Counsel's First Request for Admissions to ECM BioFilms, Inc. to be served as follows:

One electronic copy to Counsel for the Respondent:

Jonathan W. Emord
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I further certify that I possess a paper copy of the signed original of the foregoing document that is available for review by the parties and the adjudicator.

Date: November 27, 2013

/s/ Katherine Johnson

~~Katherine Johnson~~

Complaint Counsel

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

_____)
In the Matter of)
)
ECM BioFilms, Inc.,)
a corporation, also d/b/a)

Docket No. 9358