



extension of the word count limit will the parties have sufficient opportunity to synthesize this enormous record in a complete, accurate, and nuanced way.

In short, undue prejudice will result from the existing word limits. For this reason, the parties respectfully request a 2,500-word extension of the limits for the opening and answering appeals briefs, for a limit of 16,500 words each.

Dated: February 24, 2015

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2015, I caused a true and correct copy of the foregoing to be served as follows:

One electronic copy to the **Office of the Secretary**, and one copy through the FTC's e-filing system:

Donald S. Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Room H-159  
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Email: secretary@ftc.gov

One electronic copy and one hard copy to the **Office of the Administrative Law Judge**:

The Honorable D. Michael Chappell  
Administrative Law Judge  
600 Pennsylvania Ave., NW, Room H-110  
Washington, DC 20580

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: February 24, 2015

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