UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

83; 122 23.

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292) 294)

Id. ¶ 14. By

56(a)(2) and 7.

-

Id. ¶ 16. Id. Of

Id. Fed. R. Civ.

Id. ¶ 19.

Id. ¶ 22.

. ¶ 23. In 2010 and 2011,

Id. ¶ 24.

Id. ¶

3.

11.

35.

[illegible] New [illegible]

[illegible] Id. ¶ 97. [illegible]

[illegible] Id. ¶¶ 97, 132 [illegible] 40, LC [illegible]

[illegible] See, e.g., id. ¶ 109 [illegible] 11. At [illegible]

[illegible] Id. ¶ 134 [illegible] 37.

LC [illegible]

[illegible] Id. ¶¶ 138, 142 [illegible] 45.

On [illegible], LC [illegible]

[illegible] See id. ¶ 137 [illegible] 40.[8]

In [illegible] L [illegible]

[illegible] F [illegible]

[illegible]

[illegible] See id. ¶ 136.

[illegible]

[illegible] Id. [illegible]

[illegible] See id. In [illegible],

M [illegible] C [illegible] A [illegible] S [illegible] 1 [illegible] 2

[illegible] See id. (PX 22, C [illegible] Dep. 58:7 [illegible] 60:8; PX 30, C [illegible] Ex. 8). In

[illegible], LC [illegible]

2 [illegible] See id. (PX 111, a [illegible] LCM22108, 22110); see id. (PX [illegible]

[8] LC [illegible]

[illegible] S [illegible]

Id. ¶ 150 – 67.

Id. ¶ 167 (PX 45 at LCM 28646).[10]

Id. ¶¶ 158, 161.

Id. ¶¶ 159.

Id. ¶ 151,

Id. ¶¶ 152 – 54.[11]

[12] Id. ¶ 160.

2010 and 2011, LeClerc $1 and $2

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[10] S 2 ¶ 167.

[11] LeClerc S 2 ¶ 152

F[illegible] C[illegible] P[illegible] L[illegible] C[illegible] A[illegible]

[illegible]

[illegible] Id. ¶ 25 [illegible] 26, 177 [illegible] 78. M[illegible] C[illegible] FBOD [illegible]

[illegible]

A[illegible] 2011. [illegible] Id. ¶ 178. M[illegible] C[illegible]

[illegible] Id. ¶ 179 ([illegible] PX 22, C[illegible] D[illegible] 106:2 [illegible] 107:7). C[illegible]

[illegible] M[illegible]

[illegible] M[illegible] Id. ¶ 180 [illegible] 82. M[illegible]

[illegible] FBOD [illegible] CCH[illegible] P[illegible]

C[illegible] Id. ¶ 182.

D[illegible] L[illegible] Id.

[illegible]

[illegible] $2,000,000 [illegible] D[illegible] 2010. Id. ¶ 62. H[illegible] C[illegible]

[illegible] L[illegible] C[illegible] Id. ¶ 59, 63 [illegible] 65. B[illegible]

[illegible]

[illegible] Id. ¶ 59. L[illegible] C[illegible]

[illegible] L[illegible] Id.

¶ 61. D[illegible] L[illegible] C[illegible] $6.4 [illegible] M[illegible] 2011 [illegible]

[illegible] $10 [illegible] 2011. Id. ¶ 63 [illegible] 64. L[illegible] C[illegible]

[illegible] Id. ¶ 66. [illegible]

[illegible] 2010 [illegible] 2011, L[illegible] C[illegible] L[illegible] $22 [illegible]

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[14] [illegible] L[illegible] M[illegible] [illegible] Id. ¶ 174.

IV. [illegible]

[illegible] (1) [illegible] CPPA; (2) [illegible] 230 [illegible]

A. [illegible] FTCA [illegible] CPPA

[illegible] (Doc. No. 304) [illegible] 29. [illegible] FTCA [illegible] CPPA [illegible][16]

[illegible] 5 [illegible] FTCA [illegible] CPPA [illegible][17] [illegible] [1] [illegible] [2] [illegible] [3] [illegible] F.T.C. v. [illegible] 443 F.3d [illegible] 48, 63 (2d Cir. 2006) [illegible] 215 Co[illegible] 590, 597 (1990) [illegible]

[16] [illegible]

[17] [illegible]

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LLC, 564 F. Supp. 2d 119, 125 (D. Conn. 2008)

(D[illegible] [illegible] [illegible])

It is . . . [illegible] . . . [illegible] [illegible]

[illegible] [illegible]

[illegible] F.T.C. v. [illegible] Drug, Inc., 317 F.2d 669, 674 (2d Cir. 1963).

[illegible] [illegible]

[illegible] [illegible] F.T.C.
v. Colgate-Palmolive Co., 380 U.S. 374, 389 (1965). [illegible]

[illegible] [illegible] [illegible]

[illegible] Id. [illegible] [illegible]

[illegible] See F.T.C. v. Grant Connect, LLC, 827 F.
Supp. 2d 1199, 1228 (D. Nev. 2011) (D[illegible]

[illegible] [illegible]

[illegible] FTC [illegible] [illegible]

[illegible]), [illegible] 763 F.3d 1094 (9th Cir.
2014).

[illegible]

[illegible] See [illegible]

”

2.

LLC, 564 F. 3d 135 (

Id.

16.

[illegible] (2) [illegible] [illegible]

[illegible]; [illegible] (3) [illegible] [illegible] [illegible]

[illegible] F.T.C. v. L[illegible], LLC, 920 F. Supp. 2d 270, 275 (D. C[illegible] 2013);

[illegible] F.T.C. v. Accusearch, Inc., 570 F.3d 1187, 1196 (10th Cir. 2009); [illegible] U[illegible]

C[illegible] S[illegible], Inc. v. Ly[illegible], Inc., 478 F.3d 413, 418 (1st Cir. 2007) [illegible]

[illegible] Accusearch, 570 F.3d at 1196. B[illegible]

[illegible], LLC [illegible] [illegible]

[illegible] [illegible]

[illegible] [illegible]

Accusearch, 570 F.3d at 1197 [illegible]

[illegible] [illegible]

[illegible]

[illegible] [illegible]

[illegible]

[illegible] Accusearch, 570 F.3d [illegible] [illegible]

[illegible], Fair Hous. Council of San Fernando

V[illegible] v. Roommates.Com, LLC, 521 F.3d 1157, 1168 (9th Cir. 2008). [illegible] [illegible]

[illegible] [illegible]

[illegible] [illegible] [illegible] [illegible]).

Accusearch, 570 F.3d at 1197.

No. 3:06-CV-1710 (VLB), 2010 WL 669870, at *24 (D. Conn. Feb. 19, 2010).

(2)

87 F.3d 466, 468 (11th Cir. 1996)). [illegible]

[illegible] F.T.C. v. Ever Pet Co., 775 F.2d 1084, 1088 (9th Cir. 1985); see F.T.C. v. Nat'l Urological Grp., Inc., 645 F. Supp. 2d 1167, 1211 n.27 (N.D. Ga. 2008) (Evidentiary [illegible]); [illegible] 356 Fed. Appx. 358 (11th Cir. 2009); In re Ever Pet Co., 60 B.R. 863, 867 (S.D. Fla. 1986) [illegible] 13(b) to [illegible]).[24]

BsPta, LLC, 654 F.3da

Fig. Pet. Co. v. Mtg., 639 F. Supp. 2d 1291, 1294 (M.D. Fla. 2009) (

2001. The

). SEC v. Bur. Fin.

Co. of Am., Inc., 995 F. Supp. 167, 182 (D.D.C. 1998) (

$7500 (

, and

SEC v. Bur. Fin. Co. of Am., Inc., 203 F.3d 54 (D.C. Cir. 1999).

SEC v.

Aequitas All., LLC, No. 07-CV-919 FM, 2011 WL 3278907, at *19

21

(S.D.N.Y. July 26, 2011) (

SEC v.

AIC, Inc., No. 3:11-CV-176, 2013 WL 513

4411, at *17 (E.D. Tex. Sept. 12, 2013)

(

V. [illegible]

F[illegible] [illegible]

[illegible] (Do. No. 292); (2) DENIES [illegible] [illegible]

J[illegible] (Do. No. 294 [illegible]

(Do. No. 299); (4) TERMINATES [illegible] [illegible]

[illegible] [illegible]

329).

[illegible] .

D[illegible] [illegible] 2015.

/s/ J[illegible] C. H[illegible]
J[illegible] C. H[illegible]
[illegible]