





information is far outweighed by the burden and expense that will be placed on WEC if it is required to respond to this Subpoena.

WEC moves to quash or limit the Subpoena on three main grounds. First, the Subpoena is overly broad and ~~du~~uly burdensome; seeks materials which are neither relevant nor reasonably calculated to lead to the ~~discovery~~ discovery of admissible evidence, and requests records already in Respondent's ~~1-800 Contacts~~ 1-800 Contacts. ~~S R V~~ ~~Dr. Move~~ ~~Pa~~ ~~Q~~ily attainable from other sources. Second, many of the requested documents are confidential and proprietary and/or are considered trade secrets, and therefore should be protected from discovery, particularly from its ~~com~~petitor like 1-800Contacts. Third, assuming that the scope of the ~~Subpo~~ Subpoena was even manageable, and the responsive documents were relevant and not privileged, the timing of the Subpoena and the short time frame for response makes full and adequate compliance impossible.

## II. ARGUMENT



of WEC to either figure out how to produce the requested documents themselves, or hire external resources to produce such information at a very high cost. Simply put, responding to these requests is an unreasonable and monumental undertaking that could not be completed within the time allotted, if at all. Accordingly, the burden and expense required to comply with & R P S O D S U P P O E N A W F V outweighs any benefit that Complainant could hope to obtain.

Therefore, WEC respectfully requests that the Subpoena should be quashed, or at least should be limited in several significant respects.

B. General Objections to Scope of Subpoena

1. WEC objects to Complainant's Subpoena to the extent that it seeks to impose obligations on WEC that exceed or modify the requirements of the FTC's Rules of Practice, the FTC's governing regulations, and other applicable rules of procedure.

2. WEC objects to Complainant's Subpoena on the grounds that it is unduly burdensome. It seeks the production of documents that are neither relevant to the subject matter of this proceeding, nor reasonably calculated to yield information relevant to the allegations of the complaint, to the proposed relief, or to the defense of Respondent. Specifically, Complainant seeks information that is wholly unrelated to & ¶ V X V H R U D W W H P S W H -;ep p± D @U.

4. WEC objects to Complainant ¶ V 6 X E S R H Q D W R Documents ¶ W L W V protected by the attorney-client privilege, work product doctrine, the common interest privilege, and other applicable privileges, immunities, and duties of confidentiality belonging to WEC.

5. WEC objects to Complainant ¶ V 6 X E S R H Q D W R Documents ¶ W L W V seeks information or documents that constitute, contain, or refer to trade secrets or other confidential business and commercial information of WEC, including commercially sensitive information.

C. Specific Objections to Document Requests

WEC asserts the following specific objections to the categories of documents the Subpoena requires to be produced:

1. All Documents Relating to communications with 1-800 Contacts related to Negative Keywords.

Some or all of this requested information is should already be in 1 & R Q W D F W V ¶ possession and control and is therefore more readily obtainable from Respondent Notwithstanding the foregoing, this requested information is neither objected to nor is it required to be quashed, provided, however, Complainant affords WEC ample opportunity to produce.

2. For each Negative Keyword you have implemented during the Relevant Period, Documents Sufficient to Show the first date on which You instructed a Search Engine to implement such a Negative Keyword (and, if applicable, whether the Negative Keyword was implemented as an exact, phrase, or broad match) and Documents Sufficient to Show any dates on which You instructed a Search Engine to cease implementing such a Negative Keyword

WEC incorporates by reference all of its general objections set forth in Section II.B above. WEC further objects because this request is overly broad, not reasonably limited in time or scope, and unduly burdensome. This request further seeks information that is neither relevant nor material to the investigation into 1-800 Contacts. This request also seeks information that is highly confidential and proprietary to WEC, namely:

Notwithstanding the foregoing objections, provided it affords ample opportunity to WEC to review and delete any and all information that is highly confidential and proprietary to WEC, the release of 1-800 Contacts search terms in negative keyword advertising

3. All Documents Relating to communications with 1-800 Contacts regarding any actual litigation or threatened litigation, including but not limited to Documents Relating to the settlement of such actual litigation or threatened litigation.

WEC incorporates by reference all of its general objections set forth in Section II.B above. WEC further objects to the fact that some or all of the requested information is or should already be in 1-800 Contacts' possession, custody, or control. The release of information from 1-800 Contacts requiring WEC to search for records that involve communications with 1-800 Contacts is an undue and unnecessary burden that would impose needless costs on WEC.

4. All Documents Relating to communications with 1-800 Contacts related to the enforcement of any provision in an agreement between You and 1-800 Contacts settling actual litigation or threatened litigation.



e. Unit sales (i.e., quantity of each item sold).

WEC incorporates by reference all of its general objections set forth in Section II.B above. WEC further objects because its request is overly broad, not reasonably limited in time or scope, and unduly burdensome. Indeed, requesting information derived over a period of years to be broken down to weekly basis would be unduly burdensome even for a party, much less a non-party like WEC. This request further seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. Specifically, (1) WEC's D revenue, promotional discounts, shipping charges, and pricing information derived from sources other than using 1-800 Contacts search terms is not relevant to the (2) WEC's L Q Y H V W-L J D W L R Q & R Q W D F W V E L G G L Q J S U D 800 Contacts. This request also seeks information that is highly confidential and proprietary to WEC, namely sales revenue, discounts, shipping fees, and sales figures.

Notwithstanding the foregoing objections, provided it has ample opportunity to produce, WEC will attempt to provide the following information broken down on an average annual basis:

- (i) a list of products and names;
- (ii) retail prices;
- (iii) on a confidential basis, sales revenue by product for orders that were captured using 1-800 Contacts search terms marketing during the approximately two week period of time in 2010 in which WEC used 1-800 Contacts search terms W K H 3 5 H V W U; L F W H G 3 H U L R G
- (iv) on a confidential basis, promotional discounts by product for orders that were captured from 1-800 Contacts search terms marketing during the Restricted Period

(v) on a confidential basis, shipping charges by product for orders that were captured from 1-800Contacts search terms marketing during the Restricted Period and

(vi) on a confidential basis, unit sales by product for orders that were captured from 1-800Contacts search terms marketing during the Restricted Period

7. For each of the past five years, Documents Sufficient to Show for contact lens sales the annual contribution margins, net revenue; cost of goods sold; credit card fees; and variable selling general and administrative costs for the following channels:

- a. Online;
- b. Telephone or mail order;
- c. In-store; and
- d. 2WKHU LGHQWLI \ 32WKHU ´ FKDQQHOV

WEC incorporates by reference all of its general objections set forth in Section II.B above. WEC further objects because this request is overly broad and unduly burdensome. This request further seeks information that is neither relevant nor reasonably calculated to lead to the discovery of relevant evidence. SpetL F D O O \ : ( & ¶ V F R Q W U L E X W L R Q P D U J L C goods sold, credit card fees, and other costs from advertising channels unrelated to 1-800ing Contacts search terms is not relevant to) 7e & ¶ V L Q Y H V W L J D & ¶ L Q W D L F Q W W ¶ E L G G L practices or its claims against 1-800 Contacts. This request also seeks information that is highly confidential and proprietary to WEC, namely, sales revenue, fees, and other costs

8.

the use of 1-800 Contacts search terms, which may in fact be relevant to the & R Q W D F W V ¶ E L G G L Q J S U D 800 Contacts TRJ request. Also seeks information that is highly confidential and proprietary to WEC, namely keywords used and the corresponding success rates.

Notwithstanding the foregoing objections, provided it affords ample opportunity to produce, WEC will attempt to provide, on a confidential basis, the data requested in (a) that : ( & P D L Q W D L Q V W K D W L of 1-800 Contacts search terms during the Restricted Period

9681.58 Tm [(1)] TJ ET tb.02 488.11 Tm [(.)] TJ ET BT 1 0 0 1 117.02 488.11 Tm [( )] TJ E

Notwithstanding the foregoing objections, provided it affords ample opportunity to produce, WEG will attempt WR SURYLGH RQ D FRQILGHQWLDO EDVLV U of 1-800



In the event WEC is required to produce information responsive to the Subpoena, even if its scope is narrowed considerably, the cost of production is substantial, requiring the work of numerous employees including high level employees and officers reviewing, organizing, and copying thousands and thousands of documents. WEC has incurred and will continue to incur legal expenses concerning the scope of the Subpoena. Under Fed. R. Civ. P. 45, the issue is whether the subpoena imposes expenses on a party, and if so, whether those expenses are significant. If they are, the court must protect the party by requiring the party seeking discovery to bear at least enough of the expense to render the remainder "non significant." *Linder v. Calero-Portocarrero*

foregoing motion. Though the parties were able to find some common ground that could lead to further progress, the parties were unable to resolve their disputed issues during the telephone conference, thus necessitating this motion.

WHEREFORE, PREMISES CONSIDERED, WEC respectfully requests the Subpoena Duces Tecum be quashed and/or limited, and that it be awarded its reasonable attorney's fees and costs, as well as such other relief, both legal and equitable, to which it may show itself justly entitled.

Dated: October 4, 2016

Respectfully Submitted,

SAPER LAW OFFICES, LLC

/s/Daliah Saper  
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*Attorneys for Non-Party,  
WebEyeCare, Inc.*



CERTIFICATE OF SERVICE

I certify that on October 4, 2016, HOHFWURQLFDOO\ILOHG D GRFXP  
4XDVK DQG RU /LPLW 6XESRHQ Dra Trade Commission Using the E-Filing System, which will send notification of such filing to all counsel of record as well as the following:

Donald S. Clark  
Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm.-113  
Washington, DC 20580

The Honorable D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm.-110  
Washington, DC 20580

Dated: October 4, 2016

By: /s/ Daliah Saper  
Daliah Saper

CERTIFICATE FOR ELECTRONIC FILING

I hereby certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

# EXHIBIT A

US, LLC

FEDERAL TRADE

File # 1610001

5. DATE AND

SUBJECT OF

In the Matter of 1830 Contacts, Inc. Docket No. 9372

**RETURN OF SERVICE**

*I hereby certify that a duplicate original of the within subpoena was duly served: (check the method used)*

- in person.*
- by registered mail.*
- by leaving copy at principal office or place of business, to wit:*

---

---

---

*on the person named herein on:*

---

(Month, day, and year)

---

(Name of person making service)

---

(Official title)

UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION

- a. Retail price;
- b. Sales revenue;
- c. Total promotional discount;
- d. Average shipping charge; and
- e. Unit sales (i.e., quantity of each item sold).

7. For each of the past five years, Documents Sufficient to Show for contact lens sales the annual contribution margins, net cost of goods sold, credit card fees; and variable selling, general, and administrative costs, for the following channels:

- a. Online;
- b. Telephone or mail-order;
- c. In-store; and
- d. Other (identify "Other" channels).

8. Documents Sufficient to Show all Keywords relating to contact lenses organized by search advertising Campaign and Ad Group, including Negative Keywords, and the dates on which each keyword, or negative keyword, was added, and, if applicable, removed, paused, or re-started. For each Keyword listed, Documents Sufficient to Show the following information, S 1 5fn, 5each 5eywand Ad Group, rmowing05 Tc -0.0019 Tw 9.2215 TT\*ailTj 0 Shhard fa Shhard f, g  
b.

For the purpose of these Requests, the following definitions and instructions apply without regard to whether the defined terms used herein are capitalized or lowercase and without regard to whether they are used in the plural or singular forms:

### DEFINITIONS

1. The terms “Web Eye Care,” “Company,” “You,” and “Your” mean Web Eye Care, Inc., its directors, officers, trustees, employees, attorneys, agents, accountants, consultants, and representatives, its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and the directors, officers, trustees, employees, attorneys, agents, consultants, and representatives of its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, and partnerships and joint ventures.
2. The term “1-800 Contacts” means Respondent 1-800 Contacts, Inc., its directors, officers, trustees, employees, attorneys, agents, accountants, consultants, and representatives, its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and the directors, officers, trustees, employees, attorneys, agents, consultants, and representatives of its domestic and foreign parents, predecessors, divisions, subsidiaries, affiliates, and partnerships and joint ventures.
3. The term “Ad Group” has the same meaning that Google ascribes to the term in the ordinary course of business in connection with its AdWords product: a collection of advertisements that “contains one or more which target a shared set of keywords.” See <https://support.google.com/adwords/answer/6298>
4. The term “Ad Rank” has the same meaning that Google ascribes to the term in the ordinary course of business in connection with its AdWords product: “A value that’s used to determine [an advertiser’s] ad position (where ads are shown on a page) and whether [an advertiser’s] ads will show at all.” See <https://support.google.com/adwords/answer/1752122?hl=en>
5. The term “Affiliate” means any Person other than 1-800 Contacts which attempts to generate online sales for 1-800 Contacts in exchange for a commission on such online sales.
6. The terms “and” and “or” have both conjunctive and disjunctive meanings.
7. The term “Campaign” has the same meaning that Google ascribes to the term in the ordinary course of business in connection with its AdWords product: “[a] set of ad groups (ads, keywords, and bids) that share a budget, location targeting, and other settings.” See <https://support.google.com/adwords/answer/6304?hl=en>
8. The term “Click” has the same meaning that Google ascribes to the term in the ordinary course of business in connection with its AdWords product. See <https://support.google.com/adwords/answer/31799?hl=en>
9. The term “Clickthrough rate” (CTR) has the same meaning that Google ascribes to the term in the ordinary course of business in connection with its AdWords product: “the

number of clicks [an] ad receives divided by the number of times [the] ad is shown.”  
<https://support.google.com/adwords/answer/2615875?hl=en>

10. The term “Competitor” includes the Company and means any person engaged in the business of selling contact lenses to consumers.
11. The term “Computer Files” includes information stored in, or accessible through, computer or other information retrieval systems. Thus, the Company should produce Documents that exist in machine-readable form, including Documents stored in personal computers, portable computers, workstations,





25. The terms "Relate" or "Relating to" mean whole or in part Discussing, constituting, commenting, Containing, concerning, embodying, summarizing, reflecting, explaining, describing, analyzing, identifying, stating, referring to, dealing with, or in any way pertaining to.
26. The term "Search Engine" means a computer program, available to the public without charge, to search for and identify websites on the World Wide Web based on a User Query.
27. The term "Technology Assisted Review" means any process that utilizes a computer algorithm to limit the number of potentially responsive documents subject to a manual review. A keyword search of documents with further automated processing is not a Technology Assisted Review.
28. The term "User Query" means data entered into a computer by an end user of a Search Engine for the purpose of operating the Search Engine.

## INSTRUCTIONS

1. Unless otherwise indicated, each request covers documents and information dated, generated, received, or in effect from January 1, 2002, to the present.
2. The Company need not produce responsive documents that the Company has previously produced to the Commission in relation to prior investigation of 1-800 Contacts, FTC No. 141-0200. The Company must produce all other responsive documents, including any otherwise responsive documents that may have been produced by the Company to the Commission in relation to any other investigation conducted by the Commission.
3. This request for documents shall be deemed continuing in nature so as to require production of all documents responsive to any specification included in this request produced or obtained by the Company.

Metadata/Document Information	Description
Beginning Bates number	The beginning bates number of the document.
Ending Bates number	The last bates number of the document.
Custodian	The name of the custodian of the file.
To	Recipient(s) of the email.
From	The person who authored the email.
CC	Person(s) copied on the email.
BCC	Person(s) blind copied on the email.
Subject	Subject line of the email.
Date Sent	Date the email was sent.
Time Sent	Time the email was sent.
Date Received	Date the email was received.
Time Received	Time the email was received.
Attachments	The Document ID of attachment(s).
Mail Folder Path	Location of email in personal folders, subfolders, deleted items or sent items.
Message ID	Microsoft Outlook Message ID or similar value in other message systems.

- iii. Submit email attachments in image format, or native format if the file is one of the types identified in subpart (a)(i), with extracted text and the following metadata and information:

Metadata/Document Information	Description
Beginning Bates number	The beginning bates number of the document.
Ending Bates number	The last bates number of the document.
Custodian	The name of the custodian of the file.
Parent ID	The Document ID of the parent email.

Modified Date	The date the file was last changed and saved.
Modified Time	The time the file was last changed and saved.
Filename with extension	The name of the file including the extension denoting the application in which the file was created.
Production Link	Relative file path to production media of submitted native files. Example: FTC-001\NATIVE\001\FTC-00003090.xls.
Hash	The Secure Hash Algorithm (SHA) value for the original native file.

- iv. Submit all other electronic documents in image format, or native format if the file is one of the types identified in subpart (a)(i), accompanied by extracted text and the following metadata and information:

Metadata/Document Information	Description
Beginning Bates number	The beginning bates number of the document.
Ending Bates number	The last bates number of the document.
Custodian	The name of the custodian of the file.
Modified Date	The date the file was last changed and saved.
Modified Time	The time the file was last changed and saved.
Filename with extension	The name of the file including the extension denoting the application in which the file was created.
Originating Path	File path of the file as it resided in its original environment.

Hash	The Secure Hash Algorithm (SHA) value for the original native file.
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- v. Submit documents stored in hard copy in image format accompanied by OCR with the following information:

Metadata/Document Information	Description
Beginning Bates number	The beginning bates number of the document.
Ending Bates number	The last bates number of the document.
Custodian	The name of the custodian of the file.

- vi. Submit redacted documents in image format accompanied by OCR with the metadata and information required by relevant document type in subparts (a)(i) through (a)(v) above. For example, if the redacted file was originally an attachment to an email, provide the metadata and information specified in subpart (a)(iii) above. Additionally, please provide a basis for each privilege claim as detailed in Instruction 6.
- b. Submit data compilations in electronic format, specifically Microsoft Excel spreadsheets or delimited text formats such as CSV files, with all underlying data un-redacted and all underlying formulas and algorithms intact.
- c. If the Company intends to utilize any electronic search terms, de-duplication or email threading software or services in collecting or reviewing information that is stored in the Company's computer systems or electronic storage media, or if the Company's computer systems contain or utilize such software, the Company must contact Complaint Counsel to discuss whether and in what manner the Company may use such software or services when producing materials in response to this subpoena.
- d. Produce electronic file and image submissions as follows:
- i. For productions over 10 gigabytes, use EIDE, and SATA hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data in a USB 2.0 external enclosure;
  - ii. For productions under 10 gigabytes, CD-R CD-ROM optical disks formatted to ISO 9660 specifications, DVD-ROM optical disks for Windows-compatible personal computers, and USB 2.0 Flash Drives are acceptable storage formats; and

- iii. All documents produced in electronic format shall be scanned for and free of viruses prior to submission. ~~Company~~ Counsel will return any infected media for replacement, which may affect the timing of the Company's compliance with this subpoena.
- iv. Encryption of productions using ~~an~~ FIPS-compliant cryptographic hardware or software modules, ~~with~~ passwords sent under separate cover, is strongly encouraged.
- e. Each production shall be submitted with a transmittal letter that includes the FTC





validation, or quality of its document production in response to this subpoena; and identify the persons to testify on behalf of the company about information known or reasonably available to the organization, relating to its response to this specification.

- c. if the Company intends to utilize any de-duplication or email threading software or services when collecting or reviewing information that is stored in the Company's computer systems or electronic storage media in response to this subpoena, or if the Company's computer systems contain or utilize such software, the Company must contact a Commission representative to determine, with the assistance of the appropriate government technical officials, whether and in what manner the Company may use such software or services when producing materials in response to this subpoena

12. Any questions you have relating to the scope or meaning of anything in subpoena or suggestions for possible modifications hereto should be directed to Gus Chiarello at (202) 326-2633, [gchiarello@ftc.gov](mailto:gchiarello@ftc.gov). The response to the request shall be addressed to the attention of Nathaniel Hopkin, Federal Trade Commission, 400 7th Street SW, Washington, D.C. 20024, and delivered between 8:30 a.m. and 5:00 p.m. on any business day.

CERTIFICATION

Pursuant to 28 U.S.C. § 1746, I hereby certify under penalty of perjury that this response to the Subpoena Duces Tecum is complete and correct to the best of my knowledge and belief.

\_\_\_\_\_  
(Signature of Official)

\_\_\_\_\_  
(Title/Company)

\_\_\_\_\_  
(Typed Name of Above Official)

\_\_\_\_\_  
(Office Telephone)

**CERTIFICATE OF SERVICE**

I hereby certify that I delivered via electronic mail a copy of the foregoing document to:

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Garth T. Vincent  
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*Counsel for Respondent 1-800 Contacts, Inc.*

October 4, 2016

By: /s/ Daniel Matheson  
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*Counsel Supporting the  
Complaint*

Notice of Electronic Service

I hereby certify that on October 14, 2016, I filed an electronic copy of the foregoing Non-Party Motion to Quash and/or Limit Subpoena Duces Tecum, with:

D. Michael Chappell  
Chief Administrative Law Judge  
600 Pennsylvania Ave., NW  
Suite 110  
Washington, DC, 20580

Donald Clark  
600 Pennsylvania Ave., NW  
Suite 172  
Washington, DC, 20580

I hereby certify that on October 14, 2016, I served via E-Service an electronic copy of the foregoing Non-Party Motion to Quash and/or Limit Subpoena Duces Tecum, upon:

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## Complaint

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