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Court seeking to prevent the deposition from going forward; counsel for Respondent explained the need for and rationale underlying the Notice of Deposition; and counsel for Respondent, in response to certain representations by Complaint Counsel, agreed to narrow the scope of the Notice of Deposition; and

WHEREAS, after Complaint Counsel serve their responses to Respondent's Second Set of Requests for Admissions, counsel will again meet and confer regarding the Notice of Deposition in the hope of resolving the remaining disputes regarding the Notice of Deposition,

NOW, THEREFORE, IT IS HEREBY STIPULATED, SUBJECT TO THE APPROVAL OF THE COURT, AS FOLLOWS:

1. Promptly after the service of Complaint Counsel's responses to Respondent's Second Set of Requests for Admissions, Complaint Counsel and Respondent's counsel will confer regarding those responses.

2. The deposition of Complaint Counsel or their designee, which deposition had been scheduled in the Notice of Deposition for January 27, 2017, will be adjourned and, if it should proceed, will be taken on a mutually agreeable date that is no later than February 24, 2017, or such later date as is approved by the Court.

3. Within two business days after the conclusion of the meet-and-conm-0.9()-0.9()3.5(o)-9.6er

Dated: January 23, 2017

/s/ Dan Matheson

Daniel Matheson, *dmatheson@ftc.gov*

Geoffrey Green, *ggreen@ftc.gov*

Barbara Blank, *bblank@ftc.gov*

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2017, I filed the foregoing document using the FTC's 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. H-113
Washington, DC 20580

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

DATED: January 23, 2017

By: /s/ Eunice Ikemoto

Notice of Electronic Service

I hereby certify that on January 23, 2017, I filed an electronic copy of the foregoing Stipulation and Proposed Order re Discovery Issues Relating to Respondent's Requests for Admission, 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 January 23, 2017, I served via E-Service an electronic copy of the foregoing Stipulation and Proposed Order re Discovery Issues Relating to Respondent's Requests for Admission, upon:

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