

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION  
OFFICE OF THE ADMINISTRATIVE LAW JUDGES  
Washington, D.C.

07 14 2014  
570872

In the Matter of

ECM BioFilms, Inc.,  
a corporation, also d/b/a  
Envioplastics International,

Respondent.

Docket No. 9358



PUBLIC DOCUMENT

**JOINT MOTION TO EXTEND THE DEADLINE TO FILE EXPERT WITNESS  
RELATED MOTIONS *IN LIMINE***

Pursuant to the Federal Trade Commission's Rule of Practice 16 C.F.R. 3.32(f), Respondent ECM BioFilms, Inc. ("ECM") hereby submits this Joint Motion to extend the deadline for filing motions *in limine* related to expert witnesses for three days from the present deadline of July 14, 2014 to a proposed deadline of July 16, 2014. One of Complaint Counsel Katherine Johnson and one of ECM's counsel Peter Arhangelsky agreed today to file this joint motion to enable both sides to complete expert discovery before any such motions are filed. Good cause exists for granting this joint motion. Complaint Counsel's final deposition of ECM's experts is currently scheduled for July 15, 2014. Thus if submissions are required by today, two ECM expert witness depositions (one today and one tomorrow) would not be completed within the original deadline set by the Court.

All other deadlines in the Third Revised Scheduling Order remain unaffected by this motion.

Date: July 14, 2014

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Respectfully submitted,

**STATEMENT CONCERNING MEET AND CONFER**

Pursuant to Rule 3.22(g), 21 C.F.R. § 3.22(g), the undersigned counsel certifies that the parties have conferred in a good faith effort to address the issues raised in the foregoing Motion, and ECM and Ms. Johnson have



**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2014, I caused a true and correct copy of the paper original of the foregoing to be served as follows:

One electronic copy to the **Office of the Secretary** through the e-filing system:

Donald S. Clark, Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Room H-113  
Washington, DC 20580  
Email: secretary@ftc.gov

One electronic courtesy 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

One electronic copy to **Counsel for Complainant**:

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I further certify that I retain a paper copy of the signed original of the foregoing document that is available for review by the parties and adjudicator consistent with the Commission's Rules.

/s/ Jonathan W. Emord

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