

UNITED STATES OF AMERICA

In the Matter of

Jerk LLC, a limited liability company

**COMPLAINT COUNSEL'S RESPONSE TO**

**RESPONDENT'S FIRST SET OF PROPOSALS FOR A SETTLEMENT**

**GENERAL OBJECTIONS**

The following General Objections apply to each CD

# Aquaforest TIFF Junction Evaluation

REDACTED

REDACTED

3. Complaint Counsel objects to each RFA to the extent it is not relevant to the

pending proceeding against Defendant. [REDACTED]

[REDACTED]

[REDACTED]

RFA No. 1

1. The Jerk.com website has not been in operation since some time in 2013. *See* Comp. ¶ 4.

Complaint Counsel objects to this request as irrelevant, as it can be determined that [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RFA No. 2

[REDACTED]

last name, and photo. *See Comp.* §§ 4, 6.

Complaint Counsel objects to the request as vague and ambiguous. Complaint Counsel further objects to the request as unduly burdensome, as information about the requested information is more convenient, less burdensome, and less expensive to obtain from Respondent Jerk, LLC or Respondent John Fanning.

RFA No. 3

[REDACTED]

and Specific objections, Complaint Counsel admits that it has been investigating the Jerk.com website since at least August of 2012.

REA No. 5

5. People have a First Amendment right to access their...

[REDACTED]

Complaint Counsel objects to this request as irrelevant, as it seeks information that is not relevant to the subject matter of the litigation or not reasonably calculated to lead to the

[REDACTED]



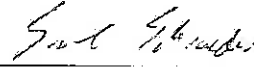
# Aquaforest TIFF Junction Evaluation

PUBLIC DOCUMENT

Respondents' defenses. Complaint Counsel further objects to the request as overly burdensome, as it is not limited to the investigation of the instant matter or prosecution of the instant case.

Dated: July 10, 2014

Respectfully submitted,



Sarah Schroeder

(415) 848-5186

[Redacted signature block]

**VERIFICATION OF SARAH SCHROEDER**

I am an attorney of record in this matter and am authorized to make this verification for and on behalf of Complaint Counsel. I have read the foregoing Complaint Counsel's Response to Respondent's First Set of Documents. I have read the foregoing Complaint Counsel's Response to Respondent's First Set of Documents. I have read the foregoing Complaint Counsel's Response to Respondent's First Set of Documents. I have read the foregoing Complaint Counsel's Response to Respondent's First Set of Documents.

[REDACTED]



**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2014, I caused a true and correct copy of the paper original of the foregoing *Complaint Counsel's Response to Respondent's First Set of Requests for Admissions* 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  
Washington, DC 20580  
Email: secretary@ftc.gov

One electronic copy to the Office of the Administrative Law Judge, Room 2000,

[REDACTED]

The Honorable D. Michael Chappell  
Administrative Law Judge  
600 Pennsylvania Ave., NW, Room H-159



Beatrice Burke

[REDACTED]