

FILED

2019 FEB -4 AM 9:08

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

FEDERAL TRADE COMMISSION,

Petitioner,

v.

FULLY ACCOUNTABLE, LLC, and

SARAH SCAVA,

Respondents.

Misc. No.

5:19 MC 21

FEDERAL TRADE COMMISSION'S MOTION FOR TEMPORARY SEAL

Filed: Feb. 4, 2019. U.S. District Court, Northern District of Ohio, Columbus. Case No. 19-10001.

As more fully explained in the attached Memorandum of Points and Authorities in Support of this Motion, certain portions of the supporting papers to the FTC's Petition describe and contain references to materials produced by Fully Accountable to the FTC in response to a civil investigative demand a form of

administrative compulsory process. Under the Federal Trade Commission Act, such materials are normally restricted from public disclosure. See 15 U.S.C. § 57b-

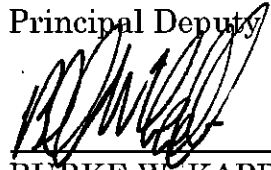
(b)(3)(C); 16 C.F.R. § 4.10(d). As provided in Rule 4.10 of the Commission's Rules of

Practice, however, such materials may be disclosed in court proceedings involving the Commission provided that the submitter of such information is "afforded an opportunity to seek an appropriate protective or *in camera* order." 16 C.F.R. § 4.10(g). A narrowly tailored temporary seal would therefore protect this information

Respectfully submitted,

ALDEN F. ABBOTT  
General Counsel

JAMES REILLY DOLAN  
Principal Deputy General Counsel



---

BURKE W. KAPPLER  
Attorney

FEDERAL TRADE COMMISSION  
600 Pennsylvania Ave., N.W.  
Washington, DC 20580  
Tel.: (202) 326-2043  
Fax: (202) 326-2477  
Email: bkappler@ftc.gov

Dated: February 1, 2019.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

**FEDERAL TRADE COMMISSION,**

Petitioner,

v.

**FULLY ACCOUNTABLE, LLC, and**

**SARAH SCAVA,**

Respondents.

Misc. No.

**FEDERAL TRADE COMMISSION'S  
MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
MOTION FOR TEMPORARY SEAL**

Petitioner Federal Trade Commission ("FTC") moves the Court *ex parte* for an

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

produced the material[]." 15 U.S.C. § 57b-2(b)(3)(C); *see also* 16 C.F.R. §§ 4.10(a)(8),

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Commission adjudicative or court proceedings, provided that the submitter of such information is afforded an opportunity to seek a protective or *in camera* order. 16



the public record. If Fully Accountable does seek its own seal within that period, then the seal remains in place while the Court evaluates Fully Accountable's motion on its merits, consistent with the standards in *Shane Grp., Inc.* Either way, the

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. The Federal Trade Commission Act and the Commission's Rules of Practice restrict from disclosure such information and the Commission may only

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

and this Court rules upon such motion;

**IT IS FURTHER ORDERED** that the Clerk place on the public record versions of these documents with the sealed information redacted; and

**IT IS FURTHER ORDERED** that if Respondent Fully Accountable, LLC, files no motion for protective order or seal within ten days of notice of these