

07 27 2017
587655

THE STATE OF CALIFORNIA

ORIGINAL

16# - *\$

Respondent:

Respondent to (16) C.R. 1608 (16) Real Estate Fundation Partners, LLC (REVP), through counsel, hereby moves for summary judgment and a motion to quash or limit the subpoena. I am supported by DEVP1, Deanna L. Smith, DEVP2, and DEVP3.

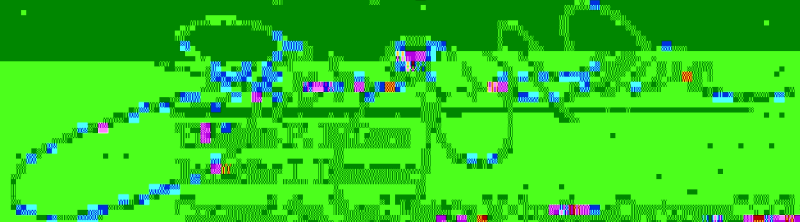
1. On July 17, 2017, Respondent served a subpoena duces tecum on REVP. A

Date: July 27, 2017

4. The undersigned hereby represents that she has read and understands the

Date: July 27, 2017

Respectfully submitted,



Elizabeth J. Blum
14400 E. Blum
Colorado Springs, Colorado 80906
Blum Law Firm, LLC
Four Southgate, 4th Floor
Techno, Suite 4000A
Denver, CO 80202
Phone: (303) 343-7100
Fax: (303) 343-0701
www.blumlawfirm.com

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that the foregoing is a true and correct copy of the original as filed with me.

Witness my hand and the seal of the Court at the City of New York, this _____ day of _____, 20____.

[Name of the undersigned]

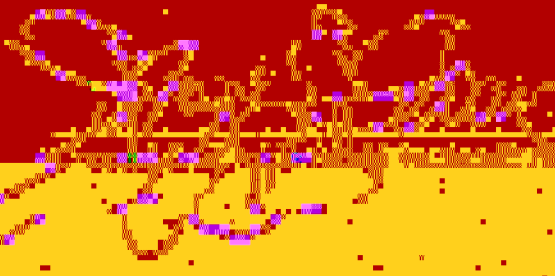
[Name of the undersigned]

[Name of the undersigned]

[Name of the undersigned]

[Name of the undersigned]

[Name of the undersigned]



[Name of the undersigned]

Notice of Electronic Service

I hereby certify that on July 27, 2017, I filed an electronic copy of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's 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 July 27, 2017, I served via E-Service an electronic copy of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena Duces Tecum, upon:

Lisa Kopchik
Attorney
Federal Trade Commission
LKopchik@ftc.gov
Complaint

Michael Turner
Attorney
Federal Trade Commission
mturner@ftc.gov
Complaint

Christine Kennedy
Attorney
Federal Trade Commission
ckennedy@ftc.gov
Complaint

Geoffrey Green
Attorney
U.S. Federal Trade Commission
ggreen@ftc.gov
Complaint

W. Stephen Cannon
Chairman/Partner
Constantine Cannon LLP
scannon@constantinecannon.com
Respondent

Seth D. Greenstein
Partner
Constantine Cannon LLP
sgreenstein@constantinecannon.com
Respondent

Richard O. Levine
Of Counsel

Constantine Cannon LLP
rlevine@constantinecannon.com
Respondent

Kristen Ward Broz
Associate
Constantine Cannon LLP
kbroz@constantinecannon.com
Respondent

Thomas Brock
Attorney
Federal Trade Commission
TBrock@ftc.gov
Complaint

I hereby certify that on July 27, 2017, I served via other means, as provided in 4.4(b) of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena Duces Tecum, upon:

Sean Pugh
Attorney
U.S. Federal Trade Commission
spugh@ftc.gov
Complaint

James J. Kovacs
Associate
Constantine Cannon LLP
jkovacs@constantinecannon.com
Respondent

Jennifer Dawson
Attorney