

Bachman Decl., at ¶ 13; see also Widor Decl., Ex. C. Following that discussion, counsel for Platinum Plus Printing had difficulties reaching her client representative because the client representative had limited cell phone and Wi-Fi service as a result of a hurricane. Bachman Decl., at ¶ 14; see also Widor Decl., Ex. C. The following week, November 2, 2020, Complaint Counsel reached out the evening of Thursday, November 5, 2020, to discuss the proposed production schedule and threaten an arbitration hearing all week, and requested a short extension until Monday, November 9, 2020. Bachman Decl., at ¶ 15; see also Widor Decl., Ex. C. Rather than allow a extension of one business day, especially in light of the underlying circumstances, Complaint Counsel rejected any extension and filed the Motion to Compel on November 6, 2020. See Bachman Decl., at ¶ 15; see also Widor Decl., Ex. C.

Meeting and conferring is a valuable tool for resolving discovery issues without court intervention. In the discussion, its primary purpose was to determine what Complaint Counsel was seeking and to understand the scope of the requested discovery, so Platinum Plus Printing could respond accordingly. After that discussion, Complaint Counsel contacted Platinum Plus Printing by phone and Wi-Fi connectivity issues as a result of a hurricane and the following week, Complaint Counsel filed the Motion to Compel. In fact, the close of fact discovery in this matter is not until February 19, 2021.

Counsel have not had an adequate opportunity to meet and confer and attempt to resolve their disagreements, and there is ample time before the close of discovery to allow for a proper meet and confer, before involving the Court. Finally, the subpoena seeks materials that are also in the

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because he can more conveniently obtain those materials from Respondent than from Platinum

Plus Printing

November 16, 2020

Respectfully submitted,

/s/ Lisa M. Lamm Bachman

Lisa M. Lamm Bachman (MN #264313)

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Attorneys for Platinum Plus Printing, LLC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

TRAFFIC JAM EVENTS, LLC, a limited liability
company, and

DAVID J. JEANSONNE II, individually and as
an officer of TRAFFIC JAM EVENTS, LLC.

Docket No: 9395

DECLARATION OF LISA M. LAMM BACHMAN

1. I am a partner with the law firm of Foley & Mansfield, PLLP, representing Platinum Plus

Printing, LLC 3 3 O D W L Q X P 3 O 3 U 5 C H W S Q Q W H W R & R P S O D L Q W & R X Q V H O ¶ V 0 R W L

Printing, LLC to Produce Materials Responsive to a Subpoena Duces Tecum

Printing, LLC to Produce Materials Responsive to a Subpoena Duces Tecum

2. I responded to Complaint & R X Q V H O ¶ V to Platinum Plus Printing on October 13,

2020 by emailing my response to Eleni Brod[0 0 612[0 0 612[0 0 612[0 0 612[0 0 612[0 0 612[0

representative was experiencing limited cell phone and Wi service. I informed Complaint Counsel of those difficulties on October 30, 2020.

5. On November 5, 2020 after 6:00 p.m., Complaint Counsel informed me that he intended to file a motion to compel if Platinum Plus Printing did not respond to portions of the subpoena by 9:00 p.m. the next day. I informed Complaint Counsel that I had been in an arbitration hearing all week, and requested a short extension to the following Monday, November 9, 2020. Complaint Counsel would not agree to any extension and filed the Motion to Compel on November 6, 2020.

I declare under the penalty of perjury that the foregoing is true and correct.

November 16, 2020

/s/ Lisa M. Lamm Bachman
Lisa M. Lamm Bachman (MN #264313)

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2020, I caused the foregoing documents to be served viaelectronic mail to:

Thomas J. Widor
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Protection Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail Stop: CG10232
Washington, DC 20580
Phone: (202) 326039
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Dated:November 17, 2020

/s/ Lisa M. Lamm Bachman
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