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A. Compl int Coun el Subpoen i Overbro

Compl int Coun el subpoena to PPP seek information which is irrelevant to the claim  
and therefore is not relevant, and which can be obtained from Respondent.

RFP No. 1: Compl int Coun el first request seek information on PPP corporate  
structure. Witness, . A, t RFP No. 1. A PPP o w ML o e R k Me o w ML o , N P c

RFP No. 2-4, 9: Compl int Coun el econ , t ir , fourt , n nint reque t ll eek inform tion w ic i obt in ble from ource w ic i more convenient, le bur en ome, or le e pen ive—Re pon ent —w o re p rtie to t i ction. T e reque t eek: (2) greement between PPP n Re pon ent ; (3) p yment between PPP n Re pon ent ; (4) inform tion on pro uct n ervice Re pon ent obt ine from PPP; n (9) communic tion rel te to reque t four. Wi or ecl., . A, t RFP No. 2-4, 9. All t i inform tion i v il ble to Compl int Coun el from Re pon ent , n t i Court ju t or ere Re pon ent Tr ffic J m vent to provi e uc oment to Compl int Coun el. *See* Or er Gr nting Compl int coun el Motion to Compel Pro uction of oment n An wer to Interrog torie , t 4-5 ( ec. 16, 2018.) (“invoice ; work or er ; oment ufficient to ow t e rel tion ip between Re pon ent TJ n Pl tinum Plu Printing, inclu ing ny greement . . . em il, te t me ge , n ny ot er communic tion to, from, or copying vi J. Je n onne II, Ju tin Brop y, C Bullock, Jim Wel n, Willi m Lilley, n Mriel ver t rel ting to Re pon ent A verti ng”). Furt erm ore, Compl int Coun el m e no owing t t p yment between PPP n Re pon ent ve ny relev ncy to t e i ue in t e ction, n Compl int Coun el t ir reque t i in epen ently i llowe on t t groun .

RFP No. 5: Compl int Coun el fift reque t eek inform tion t t i l o not relev nt to t e c e g in t Re pon ent , n ny relev nt inform tion i l o in t e po e ion of Re pon ent n oul be obt

produce such information. *See* Order Granting Complint Counsel Motion to Compel Production of Document in Answer to Interrogatories, ¶ 4–5 (Dec. 16, 2018.) (“copy of e-c unique Avertiment in Promotion 1 Material (“Avertiment”); .

ver trel ting to Re pon ent A verti ing”). T u , ll communic tion between PPP n Tr ffic J m vent i uplic tive n uc ocument re more e ily obt in ble from Re pon ent Tr ffic J m vent .

A to client or cu tomer of Tr ffic J m vent , Compl int Coun el cl im in t e motion t t t ir -p rty printer ve reporte e ling irectly wit PPP n not wit Re pon ent . Motion to Certify, t 6. Fir t, uc communic tion re unlikely to be relev nt to t e cl im g in t Re pon ent if Re pon ent were not involve in t e communic tion , e peci lly if, Compl int Coun el cl im , t e t ir p rtie i not e l wit Re pon ent . *See* -p

ction; the request is not tilore to locate document which may contain evidence relative to Respondent on the issue in this case. PPP is not party to this action, and its communication is not related to the Federal Trade Commission's proceedings.

RFP No. 11: PPP does not contest the relevance of Complaint Counsel's eleventh request, which seeks document related to any complaint related to Traffic Jam's involvement in its advertising promotion materials. Witness, et al., in RFP No. 11. However, PPP does not provide any document responsive to this request, making certification unnecessary.

RFP No. 12: Complaint Counsel's twelfth request seeks information about the individual

by the subpoena more conveniently obtainable from Respondent. See Motion to Certify, ¶ 6. Second, Complainant Counsel relies upon the *Firco* for the proposition that convenience of the tripartite argument would be rejected if the parties to the case refuse to produce documents.

See ~~id.~~

1. Waiver

PPP did not waive its convenience objection. Complainant Counsel cites no authority for the proposition that PPP waived its convenience objection by not raising it in *fyi, 61 C.W.M. (Caldicott), 148 B.R. 616*.

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December 21, 2020

Respectfully submitted,

/s/ Lisa M. Lamm Borchman  
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Attorney for Platinum Plus Printing, LLC

**CERTIFICATION OF E-VICE**

I hereby certify that on December 21, 2020, I cause the foregoing document to be served via electronic mail to:

Thomas J. Wiorek  
 Attorney, Division of Financial Practices Bureau of Consumer  
 Protection Federal Trade Commission  
 600 Pennsylvania Avenue, NW  
 Mail Stop: CC-10232  
 Washington, DC 20580  
 Phone: (202) 326-3039  
 Fax: (202) 326-3768  
[twi\\_orek@ftc.gov](mailto:twi_orek@ftc.gov)

Date: December 21, 2020

/s/ Lisa M. Lamm Borchman  
 Lisa M. Lamm Borchman  
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