

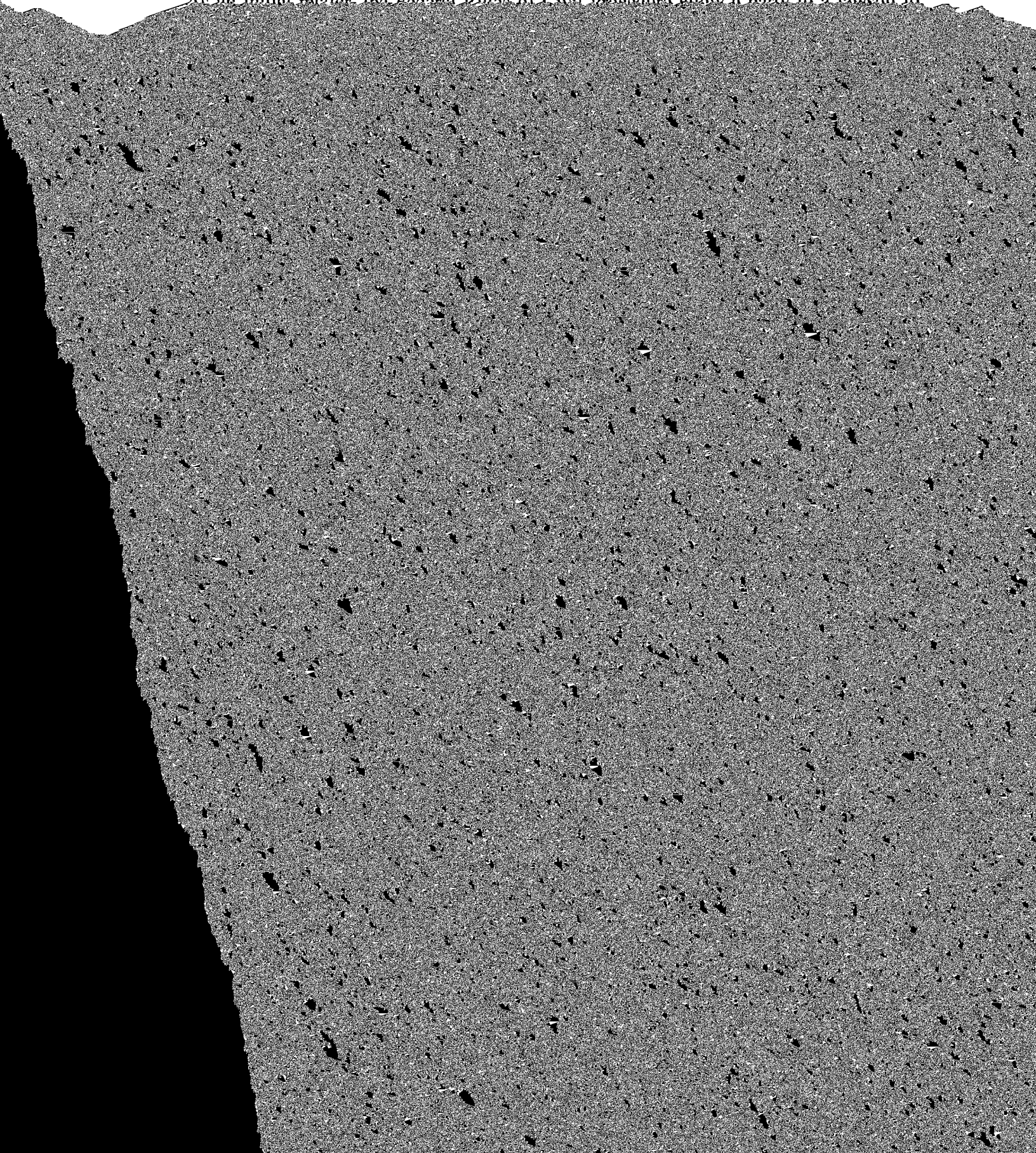
demand but rather as an independent reviewing authority with "the power to condition

Third, CCL objects to the CID's definition of "Outbound Telephone Call" in that the



C. Complying with the CID would be unduly burdensome to CCL.

As an initial matter, the Federal Rules of Civil Procedure allow a party to a lawsuit to



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on the

Subpoenaed Parties: [REDACTED]

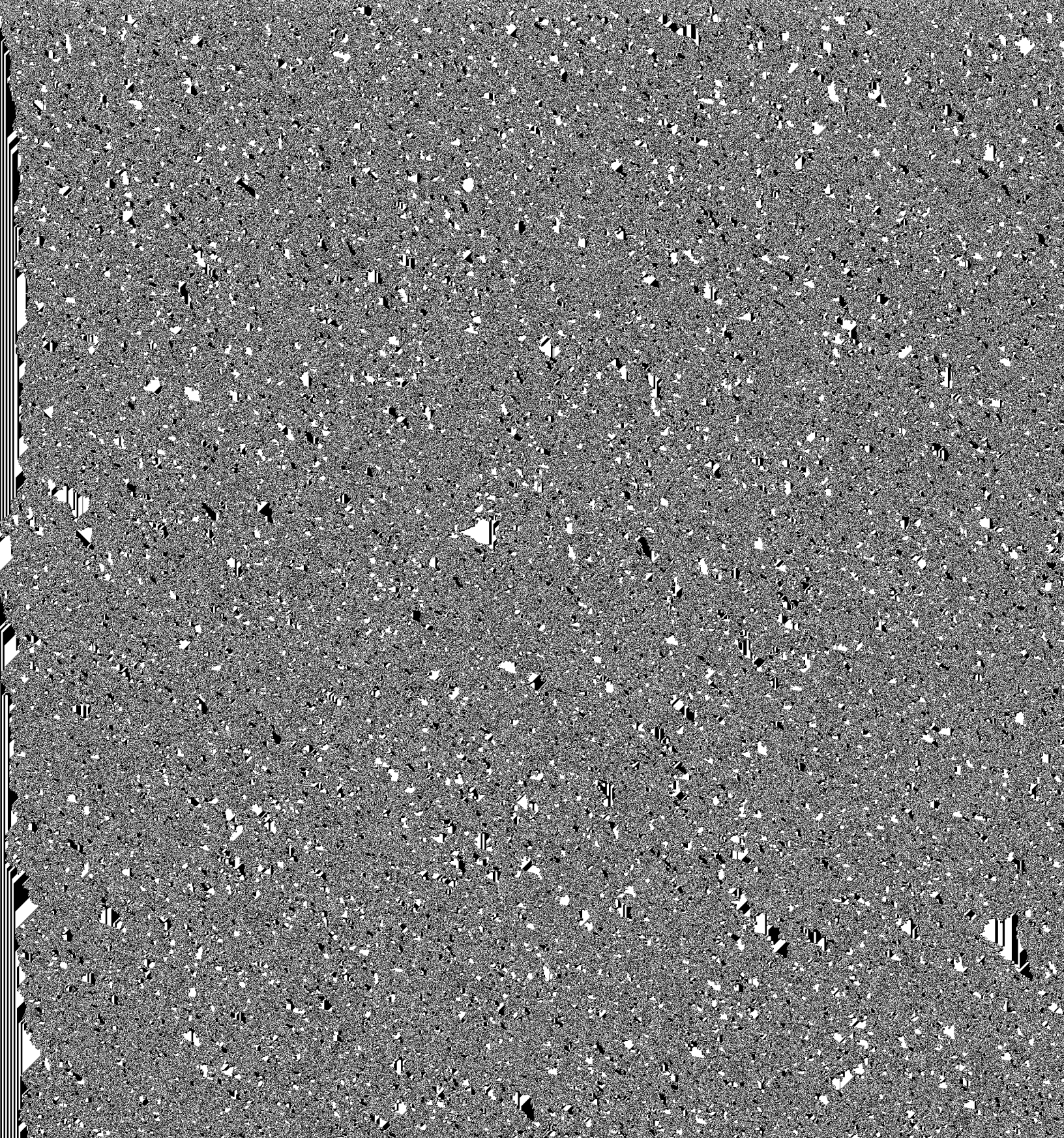
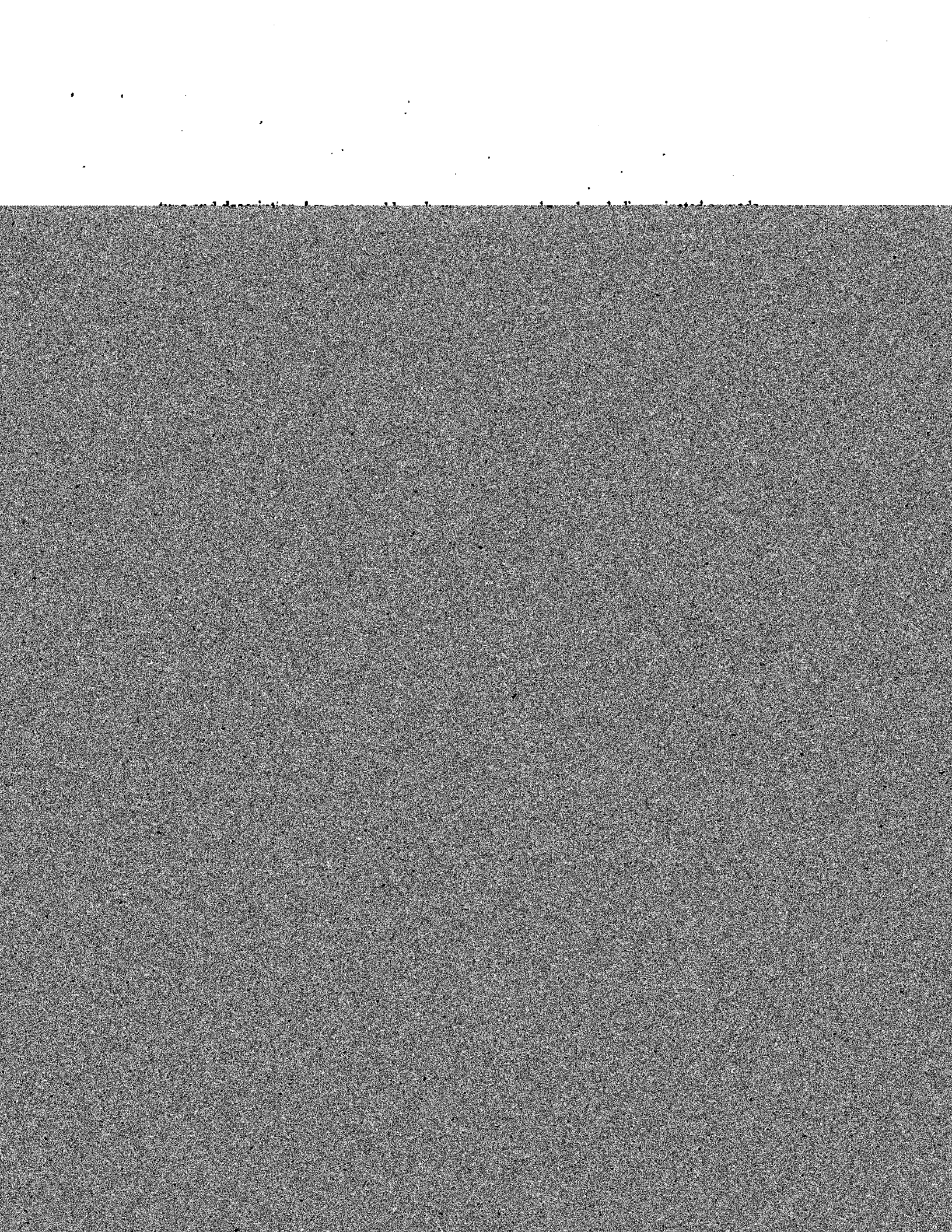


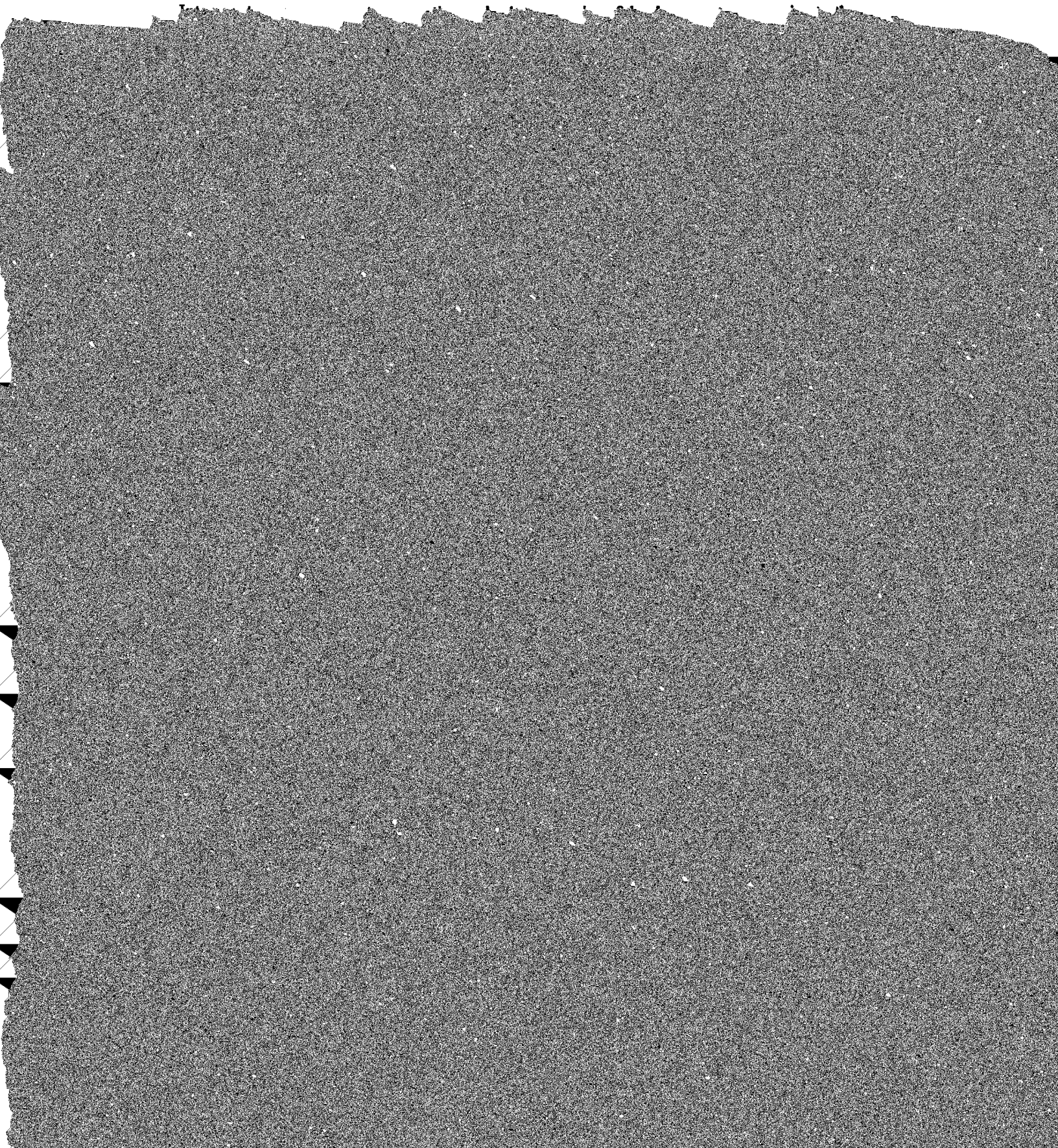
EXHIBIT A

**CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS AND**



the item; and

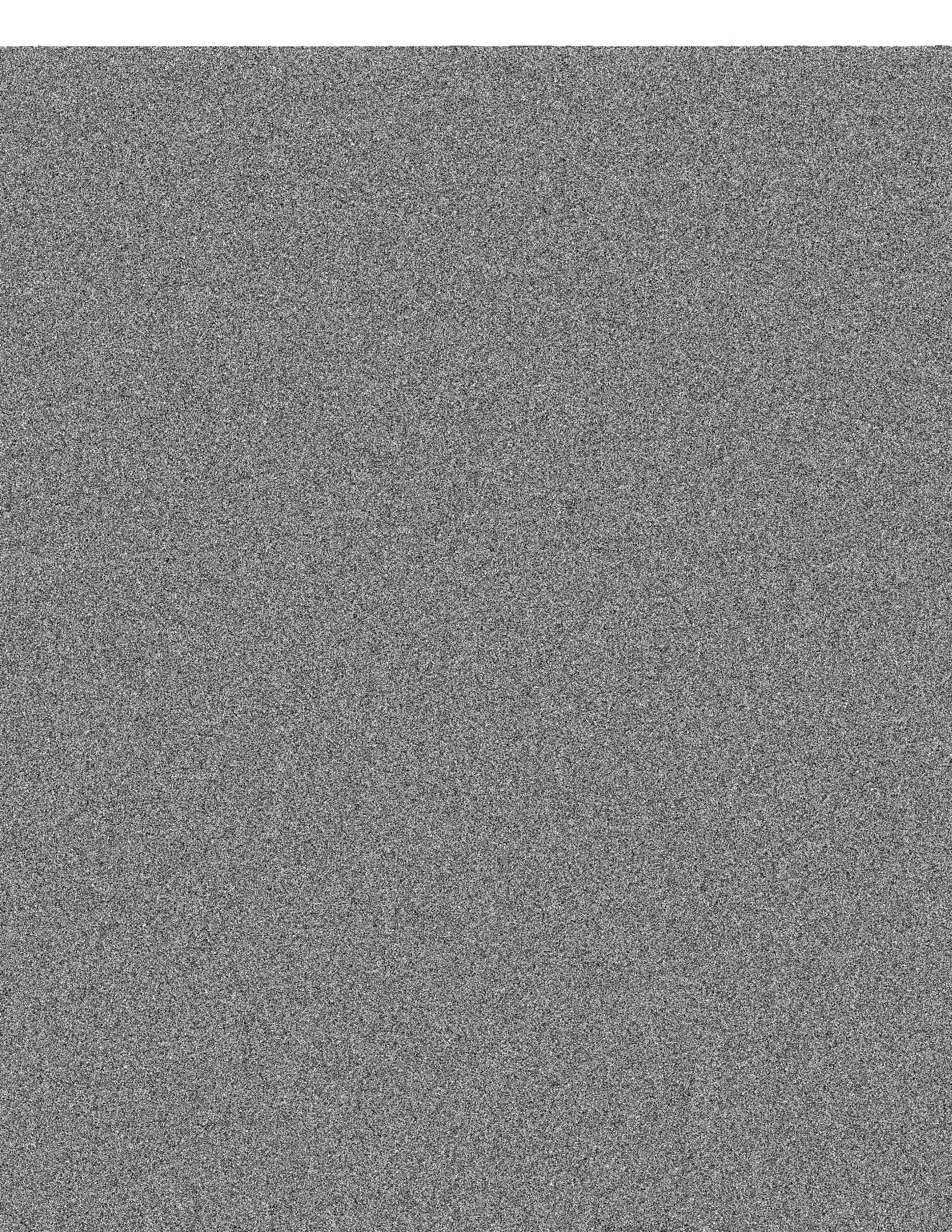
3. the specific grounds for claiming that the item is privileged

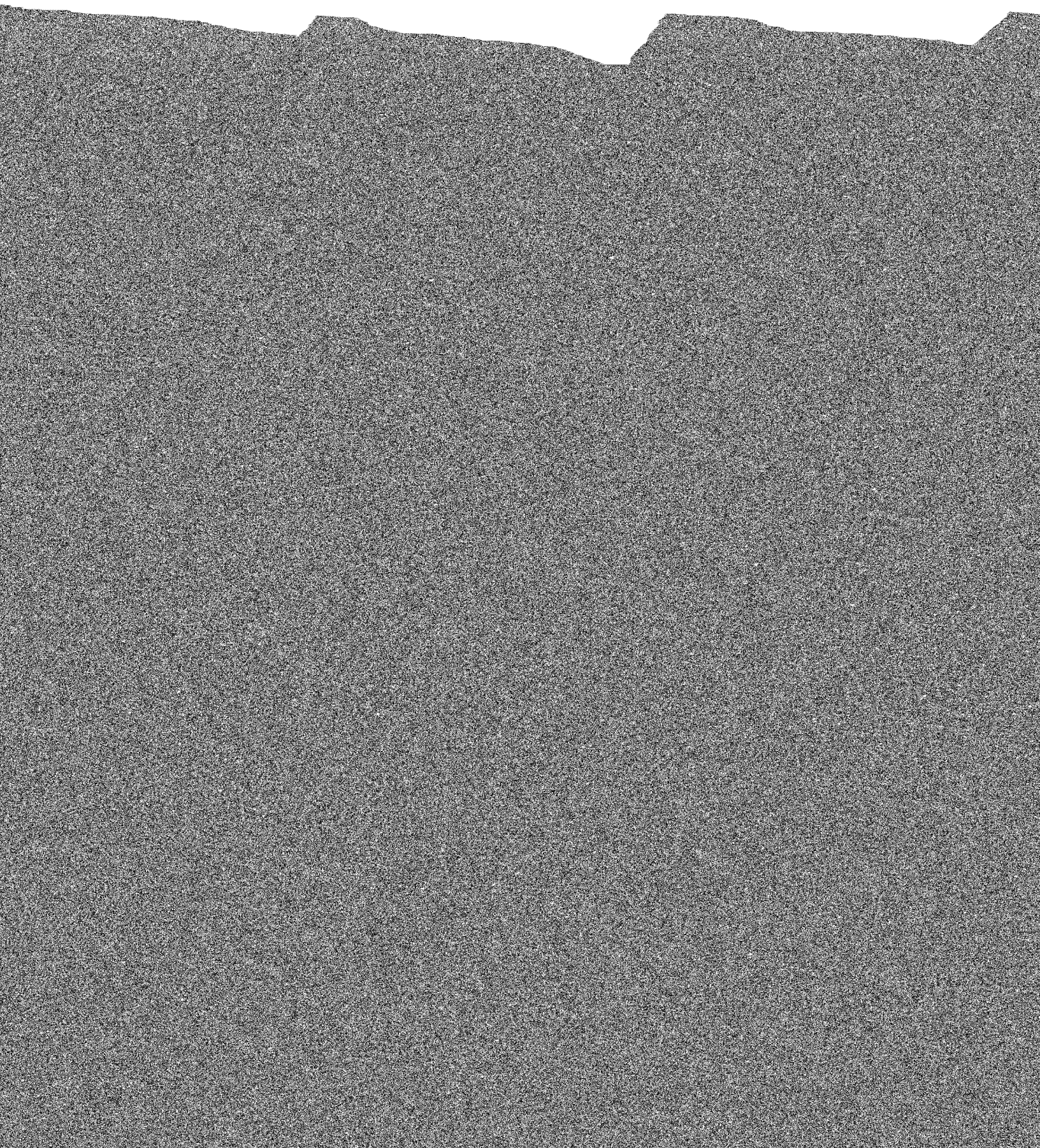


i. whether, at the time of the call, the Company had an established business relationship with the recipient of the call;

i. whether, at the time of the call, the Company had obtained an express written and

c. whether the call offered an automated interactive voice or keypad-activated opt-





UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

IN THE MATTER OF

FILE NO. 0123145

*Declaration of Jennifer Poole
in Support of Petition to Quash
File No. 0123145*

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and of the laws of the

