UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION, and OFFICE OF THE ATTORNEY GENERAL, STATE OF FLORIDA, DEPARTMENT OF LEGAL AFFAIRS, Plaintiffs, vs. LIFE MANAGEMENT SERVICES OF ORANGE COUNTY, LLC, a Florida limited liability company, *et al.*, Defendants.	**Case No.** _____ [FILED UNDER SEAL]

PLAINTIFFS' MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF PAGE LIMITATION

Plaintiffs, the Federal Trade Commission ("FTC") and Office of the Attorney General, State of Florida, Department of Legal Affairs ("State of Florida"), hereby request that the Court permit Plaintiffs to file a forty-five (45) page Memorandum in support of Plaintiffs' *Ex Parte* Motion for Temporary Restraining Order with Asset Freeze, Appointment of a Receiver, Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue ("Motion for TRO"). In support, Plaintiffs state the following:

1. Local Rule 3.01(a) prohibits parties from filing a motion and incorporated memorandum of law in excess of twenty-five (25) pages in length without prior permission of the Court.

2. Plaintiffs seek a temporary restraining order ("TRO") against Defendants for their deceptive and unfair conduct in violation of Section 5 of the Federal Trade Commission Act, U.S.C. § 45, the FTC 's Trade Regulation Rule entitled "Telemarketing Sales Rule," 16 C.F.R. Part 310, and the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes (2015).

3. Plaintiffs' Complaint alleges twelve violations of three separate federal and state laws by a group of thirteen Corporate Defendants and five Individual Defendants operating as a common enterprise, from which some of the proceeds are wrongfully distributed to two Relief Defendants. Specifically, Defendants have run a telemarketing scheme for several years that has defrauded thousands of consumer victims of more than $15 million and operated through a complex maze of shell companies, intermediaries, bank accounts, and business locations. Due to the complexity, scope, and scale of Defendants' scheme, Plaintiffs need more than twenty-five (25) pages to address the applicable legal standards and establish the factual predicate for entry of the requested *ex parte* TRO.

WHEREFORE, Plaintiffs respectfully request that this Court issue the proposed Order filed concurrently herewith, granting Plaintiffs leave to file their Memorandum in support of their Motion for TRO in excess of twenty-five (25) pages.

Dated: June 7, 2016.

PAMELA JO BONDI
Attorney General
State of Florida

Jennifer Hinton Knutton
Assistant Attorney General

Florida Bar # 92771
Email: Jennifer.Knutton@myfloridalegal.com

Denise Beamer
Assistant Attorney General
Florida Bar #69369
Denise.Beamer@myfloridalegal.com

Office of the Attorney General
Consumer Protection Division
135 W. Central Blvd., Suite 670
Orlando, Florida 32801
Telephone: (407) 316-4840
Facsimile: (407) 245-0365

Attorneys for Plaintiff
OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA,
DEPARTMENT OF LEGAL AFFAIRS

DAVID C. SHONKA
Acting General Counsel

Tejasvi M. Srimushnam
Tel: (202) 326-2959
E-mail: tsrimushnam@ftc.gov

Joshua A. Doan
Tel: (202) 326-3187
E-mail: jdoan@ftc.gov

Federal Trade Commission
600 Pennsylvania Ave., NW, Mail Stop H-286
Washington, DC 20580
Fax: (202) 326-3395

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION