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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. STUDENT ADVOCATES TEAM, LLC, et al., Defendants.	Case No.: 8:19-cv-01728-JVS-JDE **PLAINTIFF'S NOTICE OF MOTION AND MOTION TO COMPEL RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS (SET ONE AND SET TWO) TO DEFENDANT BRADLEY JASON HUNT AND PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS (SET TWO) TO DEFENDANT SEAN QUINCY LUCERO** Magistrate: Hon. John D. Early Date: November 5, 2020 Time: 10:00 a.m. Courtroom: 6A Discovery Cutoff: January 27, 2021 Pretrial Conference: May 10, 2021 Trial Date: May 22, 2021

TO ALL PARTIES AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on November 5, 2020 at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 6A of the above-entitled Court, located at 411 West 4th Street, Santa Ana, CA 92710 or telephonically by preference of the Court, Plaintiff Federal Trade Commission ("FTC") will and hereby does move the Court for an order compelling production of documents or further responses by (i) Defendant Bradley Jason Hunt in response to Plaintiff's Requests for Production of Documents, Set One, served on or about December 5, 2019, and Plaintiff's Requests for Production of Documents, Set Two, served on or about March 4, 2020; and (ii) Defendant Sean Quincy Lucero in response to Plaintiff's Requests for Production of Documents, Set Two, served on or about March 4, 2020.

Pursuant to Federal Rule of Civil Procedure 37(a)(3)(B)(iv), Plaintiff moves to compel Defendants Hunt and Lucero to produce responsive documents within two weeks of the court's order and/or provide a sworn statement that they conducted a diligent search and no responsive documents exist, detailing the methods employed by Defendants to locate responsive documents. This Motion is made on the grounds that, despite Defendants' representations that they would produce responsive documents, Defendants have not made a timely and complete production of documents and have ignored Plaintiff's requests that they stipulate to a timeline for production to ensure that document are produced in time to allow completion of discovery on the current schedule.

This Motion is based on this Notice of Motion and Motion; the accompanying Joint Stipulation and Declaration of Delilah Vinzon; all pleadings and other documents on file in this action; and on any such other matters as may be presented to Court at the time of the hearing.

This Motion is made following conferences of counsel pursuant to L.R. 37-1, which took place on March 23, 2020 and September 10, 2020.

DATED: October 14, 2020

/s/ Delilah Vinzon
Delilah Vinzon
John D. Jacobs
Maricela Segura

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION