IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FEDERAL TRADE COMMISSION, *et al.,* *Plaintiffs,* v. AMERICAN FUTURE SYSTEMS, INC., *et al.,* *Defendants.*	Case No. 2:20-cv-02266

JOINDER OF DEFENDANTS, INTERNATIONAL CREDIT RECOVERY, INC., RICHARD DIORIO, JR., AND CYNTHIA POWELL, TO AFS DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

Defendants, International Credit Recovery, Inc. ("ICR"), Richard Diorio, Jr. ("Mr. Diorio"), and Cynthia Powell ("Ms. Powell" and collectively the "ICR Defendants"), by and through their undersigned counsel, hereby join American Future Systems, Inc., Progressive Business Publications of New Jersey, Inc., and Edward M. Satell's (the "AFS Defendants") Motion to Dismiss Plaintiffs' First Amended Complaint (the "Motion to Dismiss").

The AFS Defendants' Motion to Dismiss details how Pennsylvania's Unfair Trade Practices and Consumer Protection Law (the "UTPCPL"), as a consumer protection statute, does not apply to business-to-business transactions and how the Commonwealth of Pennsylvania's authority to enforce the UTPCPL is limited to matters involving individual consumers, not business-to-business transactions. Such arguments are applicable to the ICR Defendants as well, since the ICR Defendants collect commercial debts that stem from business-to-business transactions. Therefore, the ICR Defendants join the AFS Defendants Motion to Dismiss.

WHEREFORE, the ICR Defendants respectfully request that this Honorable Court enter the attached order.

Respectfully submitted,

HLADIK, ONORATO & FEDERMAN, LLP

Date: February 25, 2021

By: **/s/ Pamela Cunningham**
Stephen M. Hladik, Esquire
Pamela Cunningham, Esquire
Attorneys for Defendants
International Credit Recovery, Inc.,
Richard Diorio, Jr., and
Cynthia Powell