UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
SOUTHEAST REGION

225 Peachtree Street, NE, Suite 1500
Atlanta, GA 30303

Michael A. Boutros, Esq.

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March 24, 2020

Via Email (robert@roberteckardlaw.com)

Robert D. Eckard, Esq.
Law Office of Robert Eckard & Associates, P.A.
3110 Alternate US 19 North
Palm Harbor, FL 34683

RE: *Federal Trade Commission v. First Choice Horizon LLC, et al.*, Case No. 6:19-cv-1028-PGB-LRH, U.S. District Court Middle District of Florida

Dear Robert:

We write this letter pursuant to Local Rule 3.01. Before filing any motions with the Court, we are seeking to set up a meet and confer with the Defendants regarding their failure to respond to Plaintiff Federal Trade Commission's ("Plaintiff" or "FTC") First Sets of Interrogatories to all Defendants, and Plaintiff's First Request for Production of Documents and Things to Defendants. Per the parties' agreement, these discovery requests were served via email on February 19, 2020, and responses were due no later than March 20, 2020. We emailed you yesterday, March 23, 2020, to inquire if we would be receiving responses, but we did not receive a response. As of today, we have not received any response to any of the requests.

We would like to set up a meet and confer to discuss the outstanding discovery and when Plaintiff can expect responses, particularly with the impending depositions scheduled to begin April 15, 2020. Given the upcoming depositions and the diminishing discovery period, please provide responses no later than **2:00 p.m., Monday, March 30, 2020**. If we do not receive responses by that time, we will be forced to immediately file a motion to compel. We hope to resolve this issue in good faith and short of filing a motion with the Court. As we already have a call set up for tomorrow, March 25, 2020 at 1:30 p.m., we propose to add this issue to that call. Please advise immediately if that presents an issue and why that may be the case.

Sincerely,

/s/ Michael A. Boutros

Michael A. Boutros

CC: Mark Bernet (via email)