UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION, Plaintiff, v. **RAGINGBULL.COM, LLC**, et al., Defendants.	Case No. 1:20-cv-03538-GLR

CONSENT MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER AND RESCHEDULE THE PRELIMINARY INJUNCTION HEARING AND BRIEFING DEADLINES

Plaintiff, the Federal Trade Commission ("FTC"), respectfully submits this motion requesting that: (1) the preliminary injunction hearing be rescheduled to February 5, 2021, (2) the preliminary injunction briefing schedule be modified as set forth below and in the attached proposed order, and (2) the duration of the modified temporary restraining order (ECF No. 64) be extended until February 5, 2021, or to a date after the preliminary injunction hearing date set by the Court. Defendants have requested an extension of the preliminary injunction hearing and briefing schedule and have agreed to extend the duration of the modified temporary restraining order. Counsel for all parties and the Receiver have conferred and consent to the relief requested herein.

The FTC filed this suit on December 7, 2020. ECF No 1. On December 8, 2020, the Court entered a temporary restraining order. ECF No 21. On December 14, 2020, the Court entered an order rescheduling the initial preliminary injunction briefing schedule and hearing date to January 13, 2021 at 9:30 a.m. ECF No. 50. On December 17, 2020, the Court entered the modified temporary restraining order ("TRO"), excepting defendant MFA Holdings Corp.

from certain provisions of the TRO, and extending the duration of the TRO to January 13, 2021. ECF No. 64. The parties now request that the Court reschedule the preliminary injunction schedule and hearing dates and extend the TRO to February 5, 2021, or until after the revised date for the preliminary injunction hearing set by the Court, as follows:

- The deadline for Defendants' consolidated response - extended to **January 13, 2021**;
- The deadline for the FTC's reply - extended to **January 27, 2021**;
- Any notice and motion for presenting live testimony at the preliminary injunction hearing - **January 28, 2021**;
- Preliminary injunction hearing - **February 5, 2021, or later date when the Court is available**.

Good cause exists to extend the TRO and reschedule the preliminary injunction hearing and briefing schedule. Due to the volume of materials filed in this action, defendants have requested additional time to familiarize themselves with the matter and prepare for the preliminary injunction hearing. All parties agree that the TRO should remain in effect until the preliminary injunction hearing takes place.

Respectfully submitted,

Dated: December 29, 2020

/s/ Sung W. Kim

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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2020, I electronically filed the foregoing with the Clerk of the Court using CM/ECF which will send a notice of electronic filing to counsel of record for Defendants.

/s/ Sung W. Kim
Sung W. Kim