UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION, Plaintiff, v. **RAGINGBULL.COM, LLC**, et al., Defendants.	Case No. 1:20-cv-3538

PLAINTIFF'S NOTICE OF NON-OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF PAGE LIMITATION

Defendants RagingBull.com, LLC, Jeffrey M. Bishop, Jason Bond, Sherwood Ventures, LLC, Jason Bond LLC, Winston Research Inc., and Winston Corp., by their counsel, filed a Motion for Leave to File Memorandum in Excess of Page Limitation ("Motion"). ECF No. 122. The FTC hereby notifies the Court of its non-opposition to that Motion.

The FTC further states the following:

1. Under the Court's latest scheduling order, Defendants were ordered to file a "consolidated Response" to the FTC's TRO Motion by 5 p.m. on January 13. ECF No. 104.

2. At approximately 4:47 p.m. on January 13, Defendants filed their Motion, seeking leave to file a 100-page Response that would give them nearly the same number of pages as if they had filed three separate briefs (105 pages, *see* Local Rule 105(3)). ECF No. 122. Thirteen minutes later, Defendants filed their 100-page Response. ECF No. 123. After the 5 p.m. deadline, Defendants proceeded to file numerous additional documents, including two expert reports. ECF Nos. 124 to 127.

3. Defendants did not inform the FTC of their intent to file a Response that exceeded the page limit prior to filing their Motion.

4. Due to the length of Defendants' Response—in effect, three separate briefs pasted together—and due to the volume of additional documents Defendants filed, the FTC may need to seek permission from this Court to exceed the standard page limitation for its reply.

5. If the FTC needs to seek permission to exceed the page limit for its reply, it will file such a motion more than 24 hours in advance of its filing deadline. And, in order to conserve the Court's resources, the FTC will provide Defendants a copy of the proposed motion prior to filing it, in an effort to obtain the parties' consent in advance of filing.

Respectfully submitted,

Alden F. Abbott
General Counsel

Dated: January 15, 2020

/s/ Laura C. Basford

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Federal Trade Commission

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2021, I electronically filed the foregoing Plaintiff's Notice of Non-Opposition to Defendants' Motion for Leave to File Memorandum in Excess of Page Limitation with the Clerk of the Court using CM/ECF which will send a notice of electronic filing to counsel of record for Defendants and the Temporary Receiver.

/s/ Laura C. Basford
Laura C. Basford