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 FILING AMENDED COMPLAINT

Plaintiff the Federal Trade Commission, pursuant to Fed. R. Civ. P. 15(a), hereby provides notice of the filing of its first amended complaint. The amended complaint deletes MFA Holdings Corp. as a defendant in this action and deletes relevant references thereto, which were included in Paragraphs 17 and 19 of the original complaint.[1] Plaintiff files the amended complaint as a matter of right because it is within 21 days of service of the responsive pleadings of all Defendants, as no Defendant has filed responsive pleadings yet. *See* Fed. R. Civ. P. 15(a).

[1] Subsequent to the filing of FTC's Complaint, MFA's director Allan Marshall has provided sworn deposition testimony and two sworn statements that shed new light on MFA's relationship to Raging Bull. Mr. Marshall explained, for example, that Raging Bull advertisements featuring his likeness were created and published without his consent or awareness and included fabricated quotes not attributable to him. ECF No. 45-1 ¶¶ 28-30; ECF No. 125 ¶¶ 3-14.

Respectfully submitted,

JAMES REILLY DOLAN
Acting General Counsel

Dated: February 4, 2021

/s/ Gordon E. Sommers

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CERTIFICATE OF SERVICE

I hereby certify that on February 4, 2021, 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 and the Temporary Receiver.

/s/ Gordon E. Sommers
Gordon E. Sommers