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 MOTION TO UNSEAL CERTAIN DOCUMENTS

Plaintiff, the Federal Trade Commission ("FTC") requests the Court unseal the following materials on the docket.

TABLE 1: DOCUMENTS TO UNSEAL

Docket Number	Description
ECF No. 188-1	Unredacted[1] Memorandum in Support of FTC's Response to Defendant's Business Plan
ECF No. 188-2	Unredacted PX 46
ECF No. 191-1	Corrected Unredacted PX 46

The Court temporarily sealed these documents on March 3, 2021. ECF No. 190. Under the Court's order, the deadline to file a motion for a protective order for the documents listed above was March 9, 2021. *Id.* No party or interested non-party requested the documents listed above be retained under seal. The deadline having now passed, the FTC requests that the Court direct the Clerk's office to unseal the above-listed documents. A proposed order is attached.

[1] Several of Plaintiff's unredacted documents will still contain minor and immaterial redactions to personally identifiable information.

Respectfully submitted,

Dated: March 11, 2021

/s/ Gordon E. Sommers

Colleen Robbins (D. Md. Temp Bar No. 92567)
Sung W. Kim (D. Md. Temp Bar No. 814609)
Gordon E. Sommers (D. Md. Temp. Bar No. 814431)
Laura C. Basford (D. Md. Temp. Bar No. 814888)
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2548; crobbins@ftc.gov
(202) 326-2211; skim6@ftc.gov
(202) 326-2504; gsommers@ftc.gov
(202) 326-2343; lbasford@ftc.gov
(202) 326-3395 (Facsimile)

Attorneys for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 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