IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION, Plaintiff, v. RAGINGBULL.COM, LLC f/k/a LIGHTHOUSE MEDIA LLC, et al., Defendants.	)	Case No. 1:20-cv-03538 - GLR

UNOPPOSED MOTION TO PERMIT RAGING BULL TO MOVE INTO PHASE 2 OPERATIONS UNDER THE BUSINESS PLAN AND MARCH 26, 2021 ORDER

Defendants RagingBull.com, LLC, Jeffrey M. Bishop, and Jason Bond, (collectively, "Raging Bull") respectfully submit this motion to permit Raging Bull to move into Phase 2 operations under Raging Bull's Business Plan (ECF No. 117) and the Court's March 26, 2021 Order ("March 26 Order") (ECF No. 214). Plaintiff Federal Trade Commission ("Plaintiff") does not object to the relief sought in this Motion.

1. Raging Bull has been working through Phase 1 of its Business Plan, which Raging Bull submitted to the Court on February 19, 2021 (Dkt. No. 177) and which the Court incorporated into the March 26 Order (Dkt. No. 214) governing the resumption of Raging Bull's business operations.

2. Affiliated Monitors, Inc. (the "Monitor") was appointed as compliance monitor in part to ensure Raging Bull's compliance with the March 26 Order. (Dkt. No. 214.)

3. As a requirement for Raging Bull to move to Phase 2 of its Business Plan, the Monitor must first certify in a written report filed with the Court that Raging Bull has satisfactorily

completed the requirements contained in Phase 1 of the Business Plan and is in compliance with the March 26 Order. (ECF. No. 177 at 12; ECF. No. 214 at 11.)

4. In accordance with its duties under the Business Plan and the March 26 Order, on June 25, 2021, the Monitor filed its Second Report in which the Monitor "certifie[d] … that Raging Bull … [has] substantially complied with the [March 26] Order and completed the Phase 1 requirements under the Business Plan." (ECF No. 248 at 51.)

5. The Monitor made its certification "[b]ased on the monitoring and auditing described in [the] Second Report" and "with the knowledge that under both the [March 26] Order and the Business Plan, continued monitoring of the Company is mandated" (*Id.*) The Second Report contains a detailed analysis of Raging Bull's efforts to fulfill the Phase 1 requirements of the Business Plan and the Monitor's efforts in monitoring and auditing those efforts.

6. Given the Monitor's certification in its Second Report that Raging Bull has substantially complied with the March 26 Order and completed the Phase 1 requirements under the Business Plan, Raging Bull respectfully requests that the Court approve the Monitor's certification and issue an order permitting Raging Bull to move into Phase 2 operations as fully delineated in the Business Plan.

7. Raging Bull respectfully submits that time is of the essence in obtaining Court approval to begin Phase 2 operations. Since the Court's March 26 Order, Raging Bull has been establishing and supporting Phase 1 operations, including payments to the Monitor, payments of customer refunds, and restarting services and repairing relationships and systems which lapsed or were negatively impacted during the temporary receivership, without any incoming revenue. It is only in Phase 2 that Raging Bull will be permitted to bring in new revenue, which is essential to the survival of the company.

8. Undersigned Raging Bull counsel informed Plaintiff's counsel of this Motion. Plaintiff's counsel states that Plaintiff's position is as follows: "Given the particular requirements of Phase 1 and the information that has been provided to the FTC from Raging Bull's counsel and the Compliance Monitor, the FTC does not object to Raging Bull's motion to enter Phase 2."

WHEREFORE, Raging Bull respectfully requests that the Court enter an Order permitting Raging Bull to move into Phase 2 operations under the Business Plan and the March 26 Order.

Dated: June 29, 2021

Respectfully submitted,

RagingBull.com, LLC, Jeffrey M. Bishop, and Jason Bond

By: /s/ *Brett M. Doran*

David G. Barger (DCB# 469095)
Greenberg Traurig LLP
1750 Tysons Blvd, Suite 1200
McLean, VA 22102
Tel: (703) 749-1300
Email: bargerd@gtlaw.com

Andrew G. Berg (*admitted pro hac vice*)
2101 L Street, N.W.
Suite 1000
Washington DC 20037
Tel: (202) 331- 3100
Email: berga@gtlaw.com

Miriam G. Bahcall (*admitted pro hac vice*)
Brett M. Doran (admitted *pro hac vice*)
Greenberg Traurig, LLP
77 West Wacker Drive
Suite 3100
Chicago, IL 60601
Tel: (312) 476-5135
Email: bahcallm@gtlaw.com
Email: doranb@gtlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of June 2021 a true and accurate copy of the foregoing Unopposed Motion to Permit Raging Bull to Move into Phase 2 Operations Under the Business Plan and March 26, 2021 Order, was properly served on all parties through the ECF system.

/s/ *Brett M. Doran*