UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION, Plaintiff, v. RAGINGBULL.COM, LLC, *et al*., Defendants.	Civil Action No. GLR-20-3538

DEFENDANT KYLE W. DENNIS, WINSTON RESEARCH INC., AND WINSTON CORP.'S NOTICE OF JOINDER IN RAGINGBULL.COM'S MOTION TO STAY ENFORCEMENT OR MODIFY TEMPORARY RESTRAINING ORDER

The undersigned represent defendants Kyle W. Dennis, Winston Research Inc., and Winston Corp. (collectively, the "Dennis Defendants") and were retained this morning. The Dennis Defendants respectfully request that they be permitted to join in the Motion to Stay Enforcement or Modify Temporary Restraining Order (the "Motion to Stay") filed yesterday by defendants RagingBull.com, LLC ("Raging Bull"), Jeffrey M. Bishop, Jason Bond, Sherwood Ventures, LLC, and Jason Bond LLC.[1]

As with those defendants, the Dennis Defendants only became aware of this matter—and the fact of an FTC investigation—after they received a copy of the complaint earlier this week. None of the defendants, including the Dennis Defendants, had the opportunity to address the FTC's allegations and legal theories or otherwise be heard prior to entry of the Temporary Restraining Order. This is of particular significance for the Dennis Defendants because Mr.

[1] The Motion to Stay appears to have been inadvertently filed by Raging Bull's counsel on behalf of Winston Research Inc. and Winston Corp, whom the undersigned represent.

Dennis is not a co-founder of Raging Bull, nor does he own, manage, control or have an equity stake in the company. Rather, as the FTC concedes, he is one of many employees who work at the company and is the only individual defendant in this case who is not an officer, director or owner of the company.

Nonetheless, the FTC is seeking to freeze nearly all of Mr. Dennis' assets, regardless of whether those assets were accrued through his work as an employee of Raging Bull or from other independent means – including Mr. Dennis's own personal, profitable trading. The undersigned will endeavor to immediately meet and confer with the FTC concerning the asset freeze and other relevant matters. Should it be necessary, after participating in the meet and confer, the Dennis Defendants will promptly make any necessary application to this Court for individualized relief beyond what is already being sought in the Motion to Stay. We will also meet and confer with all counsel regarding further proceedings relating to the FTC's motion for a preliminary injunction.

Dated: December 11, 2020

Respectfully,

/s/ Jonathan Shaw

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