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 OPPOSITION TO DEFENDANTS' MOTION TO POSTPONE AND RESCHEDULE THE PRELIMINARY INJUNCTION BRIEFING SCHEDULE AND HEARING DATES

Defendants[1] ask this Court to reschedule the Preliminary Injunction ("PI") hearing in this matter and to move the date to submit materials for the hearing as contemplated in Section XXIX of the Temporary Restraining Order ("TRO") entered against them on December 8. Defendants seek more time to prepare for a preliminary injunction hearing, but they also want to use the intervening period of time to file an unknown number of motions related to the Court's TRO. As FTC counsel informed Defendants' counsel over several email exchanges on Sunday, December 13, we would agree to an extension of the TRO and a modified schedule for the briefing and hearing on the preliminary injunction if they would agree that the TRO would continue in effect until issuance of a decision on the motion for PI. However, we noted, "[i]f the defendants intend to pursue litigation regarding the terms of the TRO, we believe it will be most efficient to keep to the current schedule and go forward with a hearing on the FTC's request for a preliminary

[1] Defendants RagingBull.com. LLC, Jeffrey M. Bishop, Jason Bond, Sherwood Ventures, LLC and Jason Bond, LLC (collectively "GT Defendants") filed the motion but all Defendants have consented to the motion. D.E. 44, at 1.

injunction this Friday." The TRO is intended to serve as preliminary, temporary relief until the motion for preliminary injunction can be heard, and we see no judicial efficiency in two back-to-back sets of litigation covering many, if not all, of the same issues.

For the foregoing reasons, we respectfully submit that this Court should deny Defendants' motion to reschedule the Preliminary Injunction (PI) hearing in this matter and to move the date to submit materials for the hearing as contemplated in Section XXIX of the Temporary Restraining Order.

Respectfully submitted,

Alden F. Abbott
General Counsel

Dated: December 13, 2020

/s/ Colleen Robbins

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)
Thomas Biesty (D. Md. Temp. Bar No. 814459)
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) 326-3043; tbiesty@ftc.gov
(202) 326-3395 (Facsimile)

Attorneys for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2020, 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 identified on the service list below and via email to the unrepresented Defendants listed below:

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

Andrew G. Berg
Greenberg Traurig LLP
2101 L Street, NW
Suite 1000
Washington, DC 20037
(202) 331-3100
berga@gtlaw.com

Miriam G. Bahcall
Greenberg Traurig LLP
77 West Wacker Drive
Suite 3100
Chicago, IL 60601
(312) 476-5135
bahcallm@gtlaw.com

Attorneys for RagingBull.com, LLC, Jeffrey M. Bishop, Jason Bond f/k/a Jason P. Kowalik, Sherwood Ventures, LLC, Jason Bond, LLC

Jonathan Shaw
Boies Schiller Flexner LLP
1401 New York Ave, NW
Washington, DC 20005
(202)237-2727
jshaw@bsfllp.com

Attorney for Kyle W. Dennis, Winston Research Inc., Winston Corp

Ari N. Rothman
VENABLE LLP
600 Massachusetts Avenue, N.W.
Washington, DC 20001
202-344-4000
anrothman@venable.com
Counsel for MFA Holdings Corporation

Mark S. Saudek
Gallagher Evelius & Jones LLP
218 North Charles Street, Suite 400
Baltimore MD 21201
phone (410) 727-7702
fax (410) 468-2786
msaudek@gejlaw.com

Counsel to Receiver Peter E. Keith

Kyle W. Dennis
kyle@ragingbull.com;
kylewdennis@gmail.com

/s/ Colleen Robbins
Colleen Robbins