Donald E. Godwin
Texas State Bar No. 08056500
GODWIN BOWMAN, P.C.
1201 Elm Street, Suite 1700
Dallas, Texas 75270-2041
Ph: 214.939.4412
Fax: 214.527.3112
DGodwin@GodwinBowman.com

Attorney for Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FEDERAL TRADE COMMISSION, and STATE OF ARKANSAS, *ex rel.* LESLIE RUTLEDGE, ATTORNEY GENERAL Plaintiffs, vs. BINT OPERATIONS LLC, a limited liability company, LASHONDA MOORE, individually and as an officer of BINT OPERATIONS LLC, and MARLON DEANDRE MOORE, formerly known as MARLON DEANDRE MAIDEN, individually and as an officer of BINT OPERATIONS LLC Defendants.	CASE NO.: 4:21-CV-00518-KGB **MOTION FOR LEAVE TO FILE A REPLY TO PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE, OR, IN THE ALTERNATIVE, MOTION TO TRANSFER VENUE**

Defendants LaShonda Moore and Marlon Moore (together, the "Moores"), and BINT Operations LLC ("BINT" and collectively with the Moores, "Defendants"), file this Motion for Leave ("Motion") to Reply to Plaintiffs' Response in Opposition to Defendants' Motion to

Dismiss for Lack of Personal Jurisdiction and Improper Venue, or, in the Alternative, Motion to transfer Venue (the "Response in Opposition").

The Response in Opposition was filed on August 18, 2021, and raises numerous issues that Defendants wish to address in a reply. This request for leave is not filed with the intent to hinder or delay, but so that justice may be done. Defendants do not believe the grant of leave to file a reply will prejudice Plaintiffs in any way. Defendants' further respectfully request that, in the event this Court grants this Motion, they be given at least seven (7) days from the day the Court grants this motion to file their Reply to the Response in Opposition.

WHEREFORE, Defendants respectfully request this Court grant leave and permit Defendants to reply to Plaintiff's Response in Opposition.

Respectfully submitted,

GODWIN | BOWMAN PC

Donald E. Godwin
Texas State Bar No. 08056500
DGodwin@GodwinBowman.com
Stefanie M. McGregor
Texas State Bar No. 24037019
SMcGregor@GodwinBowman.com
Kristin M. Burns
Texas State Bar No. 24102934
KBurns@GodwinBowman.com

1201 Elm Street, Suite 1700
Dallas, Texas 75270-2041
Ph: 214.939.4412
Fax: 214.527.3112

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on or about the 23rd day of August, 2021, a true and correct copy of the above and foregoing pleading was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

Donald E. Godwin