Justin N. Bryan
Texas State Bar No. 24072006
Kristin M. Hecker
Texas State Bar No. 24116499
MCCATHERN, PLLC
3710 Rawlins, Suite 1600
Dallas, Texas 75219
Telephone: (214) 741-2662
Facsimile: (214) 741-4717
jbryan@mccathernlaw.com
khecker@mccathernlaw.com

Attorneys 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 **DEFENDANTS' MOTION FOR PROTECTION FROM PLAINTIFF FTC'S RULE 30(b)(6) DEPOSITION NOTICE**

COME NOW Defendants BINT Operations LLC ("BINT"), LaShonda Moore ("L. Moore"), and Marlon Moore ("M. Moore") (together, the "Moore Defendants") (collectively, "Defendants") and file this their Motion for Protection from Plaintiff FTC's Rule 30(b)(6) Deposition Notice, in support thereof would respectfully show the Court as follows:

1. Pursuant to FED. R. CIV. P. 26(c)(1), Defendants move the Court for protection precluding Plaintiff FTC from proceeding on the "Notice of Deposition" attached hereto as **Exhibit 1**.

2. Pursuant to FED. R. CIV. P. 26(c)(1) and Local Rule 7.2(g), counsel for BINT certifies that it has conferred with Plaintiff FTC's counsel in good faith on the specific issues in dispute both via telephone conference on August 18, 2022 and via subsequent email correspondence, attached hereto as **Exhibit 2**, on August 19, 2022. The Parties have a good faith dispute as to the relief requested in this Motion.

3. For the reasons more fully discussed in the contemporaneously filed brief, Defendants for protection precluding Plaintiff PTC from proceeding with the prospective Rule 30(b)(6) deposition.

Respectfully submitted,

MCCATHERN, PLLC

/s/ Justin N. Bryan
Justin N. Bryan (*Admitted Pro Hac Vice*)
Texas State Bar No. 24072006
jbryan@mccathernlaw.com
Kristin M. Hecker (*Admitted Pro Hac Vice*)
Texas State Bar No. 24116499
khecker@mccathernlaw.com
3710 Rawlins, Suite 1600
Dallas, Texas 75219
Telephone: (214) 741-2662
Facsimile: (214) 741-4717

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2022, a true and correct copy of the foregoing was served on all counsel of record.

/s/ Justin N. Bryan
Justin N. Bryan