UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

FEDERAL TRADE COMMISSION, and

STATE OF ARKANSAS, *ex rel.* LESLIE RUTLEDGE, ATTORNEY GENERAL,

Plaintiffs,

v.

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

PLAINTIFF FEDERAL TRADE COMMISSION'S MOTION TO COMPEL DEFENDANT BINT OPERATIONS LLC TO RESPOND TO INTERROGATORIES

PLAINTIFF FEDERAL TRADE COMMISSION'S MOTION TO COMPEL DEFENDANT BINT OPERATIONS LLC TO RESPOND TO INTERROGATORIES

Plaintiff Federal Trade Commission ("FTC"), pursuant to Fed. R. Civ. P. 37 and Local Rule 7.2(g), hereby moves the Court for an order striking defendant BINT Operations LLC's (hereafter "BINT") baseless assertion of a Fifth Amendment privilege in response to the FTC's four Interrogatories contained in the FTC's First Amended Set of Requests for Production of Documents and Interrogatories, and compelling BINT to respond fully to the FTC's four Interrogatories contained in the FTC's First Amended Set of Requests for Production of Documents and Interrogatories, and if necessary, to appoint an agent who can respond to the Interrogatories on behalf of BINT. The FTC certifies that it has conferred in good faith with counsel for BINT Operations LLC, both by telephone and by e-mail, regarding the issues

presented and has been unable to reach agreement without involvement of the Court. *See* Local Rule 7.2(g). The FTC's motion is supported by an accompanying brief, concurrently filed pursuant to Local Rule 7.2(a).

Respectfully submitted,

Dated: September 21, 2022

/s/ Anne LeJeune
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

The undersigned certifies that on September 21, 2022, a true and correct copy of the foregoing document was electronically filed with the clerk of the U.S. District Court, Eastern District of Arkansas, using the electronic case filing system of the court. The attorneys listed below were served by pursuant to the ECF notice generated by the Court.

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