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-KBG **STIPULATION OF FACTS REGARDING DEFENDANT BINT OPERATIONS LLC**

Plaintiffs and Defendants (the "Parties") jointly file this stipulation, stipulate to the following facts in this matter, and respectfully request the Court incorporate the same into the Court's record for purposes of the trial and any dispositive motions in this matter:

1. Defendant BINT Operations LLC is a Defendant in the above-captioned lawsuit.

2. On December 7, 2022, Defendant Marlon Moore provided deposition testimony in the above-captioned lawsuit. See attached **Exhibit A**, Deposition of Marlon Moore.

3. The parties stipulate that the testimony provided by Marlon Moore on December 7, 2022, individually, will also be considered the corporate testimony, pursuant to Federal Rule of Civil Procedure 30(b)(6), of Defendant BINT Operations LLC.

4. The parties further stipulate that Marlon Moore is the designated corporate representative of BINT Operations LLC.

5. The parties further stipulate that the Court may draw a negative inference from the invocation of the Fifth Amendment in the deposition testimony of Defendant BINT Operations LLC's designated 30(b)(6) representative herein proffered as corporate testimony of BINT Operations LLC.

Accordingly, the parties stipulate to the above recitations and respectfully request the Court incorporate the same into the Court's record for purposes of the trial, dispositive motions and for all other just and proper relief in this matter.

Respectfully submitted,

Dated: December 13, 2022

/s/ Anne LeJeune

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 13, 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 the ECF notice generated by the Court.

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