UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION, Plaintiff, v. ON POINT GLOBAL LLC, *et al*., Defendants.	Case No. 19 Civ. 25046 (RNS)

MOTION TO DISSOLVE OR MODIFY THE *EX PARTE* TEMPORARY RESTRAINING ORDER AND SEEKING RECIPROCAL DISCOVERY

Defendants Robert Zangrillo, Dragon Global LLC, Dragon Global Management LLC, Dragon Global Holdings LLC, and On Point Capital Partners LLC (collectively, "the Moving Defendants") by and through their attorneys Boies Schiller Flexner LLP hereby move this Honorable Court to dissolve or modify the *ex parte* temporary restraining order as it pertains to the Moving Defendants and for reciprocal discovery in advance of the January 10, 2020 preliminary injunction hearing. The Moving Defendants respectfully request that pursuant to Rule 65(b)(4) of the Federal Rules of Civil Procedure, that a hearing be held upon this motion on Tuesday, December 31, 2019, or "as promptly as justice requires." *Id*. A memorandum of law in support of this motion is being filed contemporaneously with this motion.

WHEREFORE, for the reasons set forth herein and in the accompanying memorandum of law in support of this motion, the Moving Defendants request that the TRO be dissolved, that a hearing be held upon this motion, and that reciprocal discovery be ordered in advance of the January 10, 2020 preliminary injunction hearing.

CERTIFICATE OF PRE-FILING CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I hereby certify that on numerous occasions, most recently by e-mail on December 26, 2019, counsel for the Moving Defendants conferred with counsel for the FTC in an attempt to resolve the issues raised in the instant motion without the Court's intervention but was unable to do so.

Dated: December 27, 2019

Respectfully submitted,

s/Marshall Dore Louis
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