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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FEDERAL TRADE COMMISSION, Plaintiff, v. THEFBAMACHINE INC. et al., Defendants.	CIV. NO. 24-06635 (JXN) (LDW)

NOTICE OF FILING OF SUPPLEMENTAL EXHIBITS

On June 3, 2024, the Court issued an *ex parte* temporary restraining order ("TRO") against defendants Bratislav Rozenfeld, also known as Steven Rozenfeld and Steven Rozen, and nine corporate defendants. (Docket No. 5.) The TRO set a preliminary injunction hearing ("PI Hearing") for June 17, 2024, at 9:30 a.m. (*Id.*) The parties subsequently jointly moved to adjourn the PI Hearing and extend the TRO until such time as the Court rules on the preliminary injunction. (Docket No. `19.) They requested that the Court set the following briefing schedule:

July 15, 2024:

- Defendants' answering pleadings, affidavits, motions, expert reports or declarations, or legal memoranda must be filed with the Court and served on counsel for Plaintiff.

- Any motion to permit live testimony at the PI Hearing filed with the Court and served on counsel for the other parties.

July 23, 2024:

- Plaintiff's responsive or supplemental pleadings, materials, affidavits, or memoranda must be filed with the Court and served on counsel for Defendants.

On June 14, the Court granted the parties' motion, setting the PI Hearing for July 30 at 11:00 a.m. and ordering the requested briefing schedule. (Docket No. 22.)

Plaintiff amended its complaint on June 14, 2024, to add Amanda Rozenfeld, also known as Amanda Peremen and Amanada Peremen, as a defendant. (Docket No.27.) Plaintiff subsequently filed an application for a preliminary injunction against Amanda Rozenfeld (Docket No. 34) and moved for the Court to align the briefing and hearing schedule for the application with the schedule set forth in the Court's June 14 Order (Docket No. 35). The Court granted the motion. (Docket No. 36.)

Defendants did not file any answering pleadings, affidavits, motions, expert reports or declarations, or legal memoranda on July 15. Accordingly, Plaintiff cannot offer any reply. Filed herewith and served on counsel for Defendants are fourteen supplemental declarations Plaintiff offers in support of its application for a preliminary injunction against Defendants. Plaintiff obtained these declarations after the Court entered the TRO, and many address conduct occurring on or after June 3, 2024.

A table of the proffered exhibits follows. Digital video and audio evidence attached to PX 24 and PX 36 are being provided to the Clerk of Court on a flash drive sent via Federal Express and to counsel of record via secure file transfer protocol to the email addresses on file with CM/ECF. Included with this Notice is a Table of Exhibits with a complete list of Plaintiff's exhibits offered to date.

Exhibit	Description	Bates Range
PX 24	Declaration of Matthew Genes	1558–1761
PX 25	Declaration of Terry Cooke	1762–64
PX 26	Declaration of Karen Denny	1765–67
PX 27	Declaration of James Deren	1768–78
PX 28	Declaration of Mark Ramirez	1779–82
PX 29	Declaration of Ian Plocher	1783–1818
PX 30	Declaration of Luke Rotta	1819–1903
PX 31	Declaration of Benjamin Vafai	1904–05
PX 32	Declaration of Jatinder Vij	1906–07
PX 33	Declaration of Bryce Wilbanks	1908–10
PX 34	Declaration of Richard Kaplan	1911–2379
PX 35	Second Declaration of Tyler Broome	2380–82
PX 36	Third Declaration of Reeve Tyndall	2383–2697

Respectfully submitted,

Dated: 7/23/24

s/ Frances L. Kern

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