

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

\_\_\_\_\_  
In the Matter of )  
 )  
Louisiana Real Estate Appraisers Board, )  
 )  
 Respondents )  
\_\_\_\_\_ )

DOCKET NO. 9374

**NON-PARTY FRISCO LENDER SERVICES, LLC’S  
MOTION FOR *IN CAMERA* TREATMENT**

Counsel for non-party Frisco Lender Services, LLC (“Frisco”), pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice. 16 C.F.R. § 3.45(b), respectfully moves this Court for *in camera* treatment for five years for six competitively-sensitive, confidential business documents (the “Confidential Documents”).

Respectfully submitted,

\_\_\_\_\_  
/s Kelley C. Barnaby  
Kelley C. Barnaby  
Hilla Shimshoni  
ALSTON & BIRD LLP  
950 F Street, NW  
Washington, DC 20004  
Phone: (202) 239-3300  
Kelley.Barnaby@alston.com  
Hilla.Shimshoni@alston.com

*Counsel for Non-Party  
Frisco Lender Services, LLC*

DATED: March 12, 2021

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of	)	
	)	
Louisiana Real Estate Appraisers Board,	)	
	)	DOCKET NO. 9374
Respondents	)	
	)	

**NON-PARTY FRISCO LENDER SERVICES, LLC’S  
MEMORANDUM OF LAW IN SUPPORT OF ITS  
MOTION FOR *IN CAMERA* TREATMENT**

Pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice. 16 C.F.R. § 3.45(b), counsel for non-party Frisco Lender Services, LLC (“Frisco” or “the Company”) submits this Memorandum of Law in support of Frisco’s motion, filed this date, for *in camera* treatment for five years for six competitively-sensitive, business documents (the “Confidential Documents”).

Counsel for The Federal Trade Commission (“FTC”) and counsel for Respondent Louisiana Real Estate Appraisers Board (“LREAB”) have stated that they do not intend to oppose Frisco’s Motion. A corresponding Statement Regarding Meet and Confer is appended to this Memorandum.

Frisco produced the Confidential Documents in response to a third-party subpoena in this matter. Respondent LREAB has now notified Frisco that it intends to introduce seven<sup>1</sup> of Frisco’s documents into evidence at the administrative trial in this matter. *See* Letter from LREAB dated June 20, 2019 (attached as Exhibit A).

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<sup>1</sup> As identified in detail below, Frisco seeks in camera treatment for six of the documents identified by LREAB. Frisco does not request in camera treatment for the document marked as RX0578.

The exhibits for which Frisco is seeking *in camera* treatment are confidential business documents that contain information regarding Frisco’s fees, including detailed fee levels by services, lender names, volumes, and geographic scope of operations. If these documents were to become part of the public record, Frisco would be significantly harmed. For the reasons discussed in this motion, Frisco respectfully requests that the Confidential Documents be afforded *in camera* treatment. In support of the motion, Frisco relies on the Affidavit of Tom Westerfield, SVP and Chief Appraiser at Frisco (“Westerfield Declaration”), attached as Exhibit B, which provides additional details regarding the Confidential Documents.

**I. The Documents for Which Protection is Sought**

Frisco seeks *in camera* treatment for the following Confidential Documents, copies of which are attached under seal in Exhibit C.

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
RX0579	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000002	FRIS00000002
RX0580	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000003	FRIS00000003
RX0581	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000004	FRIS00000004
RX0582	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000005	FRIS00000005
RX0583	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000006	FRIS00000006
RX0584	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000007	FRIS00000007

## **II. Frisco's Documents are Secret and Material to Frisco's Business and Their Disclosure Would Result in Serious Injury to the Company**

*In camera* treatment of material is appropriate when its “public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting” such treatment. 16 C.F.R. § 3.45(b). The proponent demonstrates serious competitive injury by showing that the documents are secret and that they are material to the business. *In re 1-800 Contacts, Inc.*, No. 9372, 2017 FTC LEXIS 55, at \*2-3 (Apr. 4, 2017); *In re Gen. Foods Corp.*, 95 F.T.C. 352, 355 (1980); *In re Dura Lube Corp.*, No. 9292, 1999 FTC. LEXIS 255, at \*5 (Dec. 23, 1999). In this context, courts generally attempt “to protect confidential business information from unnecessary airing.” *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961).

In considering both secrecy and materiality, the Court may consider: (1) the extent to which the information is known outside of the business; (2) the extent to which it is known by employees and others involved in the business; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. *In re Bristol-Myers Co.*, 90 F.T.C. 455, 456-57 (1977). As discussed in the Westerfield Declaration, the Confidential Documents relate to Frisco's fees, including detailed fee information, lender names, volumes, and geographic scope of operations. Such information is both secret and material to Frisco's business and, as set forth below, satisfies the standard for *in camera* treatment.

The Commission has recognized the propriety of granting *in camera* treatment to business records. *See, e.g., In re McWane, Inc.*, No. 9351, 2012 WL 3862131, at \*2 (F.T.C. Aug. 17, 2012); *In re Champion Spark Plug Co.*, No. 9141, 1982 FTC LEXIS 85, at \*2 (Apr. 5, 1982); *H.P. Hood*

*& Sons, Inc.*, 58 F.T.C. at 1188-89; *In re Kaiser Aluminum & Chem. Corp.*, 103 F.T.C. 500, 500 (May 25, 1984). Thus, the information for which Frisco seeks *in camera* treatment is eligible to receive it.

Frisco has taken significant steps to protect the confidential information contained in the Confidential Documents, which was produced pursuant to compulsory processes and under the terms of the May 31, 2017, Protective Order Governing Confidential Material in this matter (the “Protective Order”) that was issued to protect the information contained in the Confidential Documents at question here. Pursuant to the Protective Order, Frisco’s counsel designated the documents as “Confidential” to avoid any public disclosure. Furthermore, Frisco takes substantial measures to guard the secrecy of the information contained in the Confidential Documents by limiting the dissemination of that information and taking every reasonable step to protect its confidentiality. The information contained in the Confidential Documents is only disclosed to Frisco management and employees. As described in more detail in the Westerfield Declaration, the information contained in the Confidential Documents relates to Frisco’s fees and is not, and would not, otherwise become publicly available.

Finally, Frisco’s status as a third party is relevant to the treatment of its documents. The FTC has held that “[t]here can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible.” *H.P. Hood & Sons*, 58 F.T.C. at 1186. This is especially so in the case of a third-party, which deserves “special solicitude” in its request for *in camera* treatment for its confidential business information. See *In re Kaiser Aluminum.*, 103 F.T.C. at 500 (“As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future

adjudicative discovery requests.”). Frisco’s third-party status therefore weighs in favor of granting *in camera* status to the Confidential Documents.

### **III. IN CAMERA PROTECTION SHOULD EXTEND FOR FIVE YEARS**

Because of the highly confidential and proprietary nature of the information contained in the Confidential Documents – competitively significant information that Frisco continues to use and considers key to its business strategies, performance, and ongoing operations – lasting protection is appropriate in order to ensure avoidance of the competitive injuries to Frisco’s business outlined above. *See In re 1-800 Contacts*, 2017 FTC LEXIS 55, at \*3, \*8 (2017) (recognizing that *in camera* treatment is appropriate where the material remains “competitively sensitive.”). As the Commission has previously recognized, if such Confidential Information is disclosed, Frisco will lose the advantages that it currently enjoys based on its efforts to maintain the confidentiality of the information contained in the Confidential Documents. *In re Otto Bock Healthcare N. Am., Inc.*, No. 9378, 2018 FTC LEXIS 111, at \*11 (July 6, 2018) (granting *in camera* treatment for five years from time of order to non-party’s ordinary course business documents, including documents containing product level sales data and pricing information); *In re 1-800 Contacts*, 2017 FTC LEXIS 55, at \*2-3. Therefore, and in recognizing the presumption of a public trial in this proceeding, Frisco respectfully requests that the information contained in the Confidential Documents be afforded narrow *in camera* protection, limited to a period of five years.

### **IV. Conclusion**

For the reasons set forth above and in the accompanying Westerfield Declaration, Frisco respectfully requests that this Court grant *in camera* treatment for five years for the information contained in the Confidential Documents.

Respectfully submitted,

/s Kelley C. Barnaby

Kelley C. Barnaby

Hilla Shimshoni

ALSTON & BIRD LLP

950 F Street, NW

Washington, DC 20004

Phone: (202) 239-3300

Kelley.Barnaby@alston.com

Hilla.Shimshoni@alston.com

*Counsel for Non-Party*

*Frisco Lender Services, LLC*

DATED: March 12, 2021

## **STATEMENT REGARDING MEET AND CONFER**

The undersigned certifies that counsel for non-party Frisco Lender Services, LLC (“Frisco”) notified counsel for the parties via telephone on or about July 25, 2019, and via email on or about March 11, 2021, that it would be seeking *in camera* treatment of the Confidential Documents. Both counsel for the Federal Trade Commission and counsel for Respondent Louisiana Real Estate Appraisers Board indicated that they did not intend to oppose Frisco’s motion.

Respectfully submitted,

\_\_\_\_\_  
*/s Kelley C. Barnaby*  
Kelley Barnaby  
Hilla Shimshoni  
ALSTON & BIRD LLP  
950 F Street, NW  
Washington, DC 20004  
Phone: (202) 239-3300  
Kelley.Barnaby@alston.com  
Hilla.Shimshoni@alston.com

*Counsel for Non-Party  
Frisco Lender Services, LLC*

DATED: March 12, 2021



# **EXHIBIT A**

CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

**James J. Kovacs**

Attorney

202-204-3518

jkovacs@constantinecannon.com

June 20, 2019

**Via E-Mail and Mail**

Kelley Connolly Barnaby

Alston & Bird

The Atlantic Building

950 F Street, NW

Washington, DC 20004-1404

Re: *In the Matter of Louisiana Real Estate Appraisers Board*, FTC Dkt. 9374

Dear Ms. Barnaby,

This letter will constitute notice to your client Frisco Lender Services, LLC, pursuant to 16 C.F.R. § 3.45(b) and paragraph 7 of the July 6, 2017 Scheduling Order in the above-captioned matter, that Respondent Louisiana Real Estate Appraisers Board (“LREAB”) intends to use the materials referenced on the attached Exhibit A as evidence at the administrative trial scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless *in camera* treatment is granted by Administrative Law Judge D. Michael Chappell.

Pursuant to 16 C.F.R. § 3.45, for documents or testimony that you believe include sensitive or confidential information that you do not want on the public record, you must file a motion for *in camera* status with Judge Chappell. As indicated in paragraph 7 of the July 6, 2017 Scheduling Order, motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45, explained in *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS (Feb. 23, 2015); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for *in camera* treatment shall provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

Under the Fourth Revised Scheduling Order dated March 26, 2019, the deadline for filing motions seeking *in camera* status is **August 2, 2019**.

## CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

June 20, 2019

Page 2

Please contact me via email or at (202) 204-3518 if you have any questions regarding the foregoing.

Best regards,

/s/ James J. Kovacs

James J. Kovacs

## CONSTANTINE CANNON LLP

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Page 3

# EXHIBIT A

## CONSTANTINE CANNON LLP

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Exhibit #	Description	Date	Beg Bates	End Bates
RX0578	Letter from Kelley Connolly Barnaby to W. Stephen Cannon; Kristen Broz re: In the Matter of Louisiana Real Estate Appraisers Board, Docket No. 9374	2/7/2018	FRIS00000001	FRIS00000001
RX0579	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000002	FRIS00000002
RX0580	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000003	FRIS00000003
RX0581	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000004	FRIS00000004
RX0582	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000005	FRIS00000005
RX0583	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000006	FRIS00000006
RX0584	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000007	FRIS00000007

# **EXHIBIT B**

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of	)	
	)	
Louisiana Real Estate Appraisers Board,	)	
	)	DOCKET NO. 9374
Respondents	)	
	)	

**DECLARATION OF TOM WESTERFIELD  
IN SUPPORT OF NON-PARTY FRISCO LENDER SERVICES, LLC’S  
MOTION FOR *IN CAMERA* TREATMENT**

I, Tom Westerfield, hereby declare as follows:

1. I am the Senior Vice President and Chief Appraiser at Frisco Lender Services, LLC (“Frisco”). I make this declaration in support of non-party Frisco’s Motion for *in camera* treatment for certain documents (the “Motion”).

2. I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

3. I have reviewed and am familiar with the documents Frisco produced in the above-captioned matter in response to a subpoena from the Louisiana Real Estate Appraisers Board (“LREAB”). Given my position at Frisco, I am familiar with the type of information contained in the documents at issue and its competitive significance to Frisco. Based on my review of the documents, my knowledge of Frisco’s business, and my familiarity with the confidentiality protection afforded this type of information by Frisco, the disclosure of these documents to the public and to competitors of Frisco would cause serious, irreparable competitive injury to Frisco.

4. Respondent LREAB has now notified Frisco that it intends to introduce six of Frisco’s competitively-sensitive, confidential documents into evidence at the administrative trial in this matter. As described in the Motion, Frisco seeks *in camera* protection for the information related to Frisco’s fees and sensitive operational information contained in these documents which are listed below.

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
RX0579	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000002	FRIS00000002
RX0580	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000003	FRIS00000003
RX0581	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000004	FRIS00000004
RX0582	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000005	FRIS00000005
RX0583	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000006	FRIS00000006
RX0584	Frisko Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000007	FRIS00000007

5. Publicly disclosing any of Frisco’s confidential financial information is not necessary in this proceeding and could be detrimental to Frisco whose only involvement in this proceeding is as a third party.

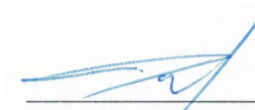
6. Frisco has taken significant steps to protect the confidential information contained in the documents identified above. Frisco takes substantial measures to guard the secrecy of this confidential information by limiting the dissemination of the information and taking every reasonable step to protect its confidentiality. The information is only disclosed to Frisco



management and employees as needed and appropriate. The information is not, and would not, otherwise become publicly available.

7. RX0579 through RX0584 contain confidential information regarding Frisco's operations, including lender names (as to RX0579), the fees that Frisco pays to appraisers, and detailed information about its volume and geographic footprint (as to all six documents). Disclosure of detailed information regarding Frisco's scope of operations, lender identities, and fees its pays to appraisers could have a material impact on Frisco's ability to conduct its business and its ability to compete. Even though the fees are several years old, disclosure of this information could still be used by Frisco's competitors to analyze Frisco's current place in the market, the scope and details of its appraisal operations including detailed geographic footprint, and its confidential business strategies, giving those competitors an unfair competitive advantage over Frisco. Therefore, the information related to the fees that Frisco pays to appraisers should be given *in camera* protection.

8. I declare under penalty of perjury that the foregoing is true and correct.



---

Tom Westerfield  
Senior Vice President and Chief Appraiser  
Frisco Lender Services, LLC

Signed this 10<sup>th</sup> day of March 2021.

# **EXHIBIT C**

**DOCUMENTS MARKED CONFIDENTIAL  
REDACTION IN THEIR ENTIRETY REQUESTED**

## CERTIFICATE OF SERVICE

I, Hilla Shimshoni, declare under penalty of perjury that the following is true and correct.

On March 12, 2021, I caused to be served the following documents on the parties listed below by the manner indicated:

- Non-Party Frisco Lender Services, LLC's Motion for *In Camera* Treatment, with accompanying Memorandum of Law and all Exhibits, and Statement Regarding Meet and Confer
- [Proposed] Order Granting *In Camera* Treatment

**The Office of the Secretary (via FTC E-Filing System (public version) and email (non-public version))**

April Tabor  
Acting Secretary  
Office of the Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-172  
Washington, DC 20580  
[ElectronicFilings@ftc.gov](mailto:ElectronicFilings@ftc.gov)

**The Office of the Administrative Law Judge (via FTC E-Filing System (public version) and email (non-public version))**

The Honorable D, Michael Chappell  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-106  
Washington, DC 20580

**Complaint Counsel for Federal Trade Commission (via FTC E-Filing System (public version) and email (non-public version))**

Daniel J. Matheson  
Lisa B. Kopchik  
J. Alexander Ansaldo  
Wesley G. Carson  
Nathaniel M. Hopkin  
Kenneth H. Merber  
Thomas H. Brock Federal Trade Commission  
400 7th Street, SW  
Washington, DC 20024  
[dmatheson@ftc.gov](mailto:dmatheson@ftc.gov)  
[lkopchik@ftc.gov](mailto:lkopchik@ftc.gov)  
[jansaldo@ftc.gov](mailto:jansaldo@ftc.gov)

[wcarson@ftc.gov](mailto:wcarson@ftc.gov)  
[nhopkin@ftc.gov](mailto:nhopkin@ftc.gov)  
[kmerber@ftc.gov](mailto:kmerber@ftc.gov)  
[tbrock@ftc.gov](mailto:tbrock@ftc.gov)

**Counsel for Louisiana Real Estate Appraisers Board (via FTC E-Filing System (public version) and email (non-public version))**

W. Stephen Cannon

Seth D. Greenstein

Richard O. Levine

Allison F. Sheedy

James J. Kovacs

J. Wyatt Fore Constantine Cannon

1001 Pennsylvania Ave NW, 1300N

Washington, DC 20004

[scannon@constantinecannon.com](mailto:scannon@constantinecannon.com)

[sgreenstein@constantinecannon.com](mailto:sgreenstein@constantinecannon.com)

[rlevine@constantinecannon.com](mailto:rlevine@constantinecannon.com)

[asheedy@constantinecannon.com](mailto:asheedy@constantinecannon.com)

[jkovacs@constantinecannon.com](mailto:jkovacs@constantinecannon.com)

[wfore@constantinecannon.com](mailto:wfore@constantinecannon.com)

\_\_\_\_\_  
/s Hilla Shimshoni

**CERTIFICATE FOR ELECTRONIC FILING**

I, Hilla Shimshoni, certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by parties and adjudicator.

Dated: March 12, 2021.

/s Hilla Shimshoni

**UNITED STATES OF AMERICA  
 FEDERAL TRADE COMMISSION  
 OFFICE OF ADMINISTRATIVE LAW JUDGES**

In the Matter of	)	
	)	
Louisiana Real Estate Appraisers Board,	)	
	)	DOCKET NO. 9374
Respondents	)	
	)	

**NON-PARTY FRISCO LENDER SERVICES, LLC’S  
[PROPOSED] ORDER**

Upon consideration of non-party Frisco Lender Services, LLC (“Frisco”) Motion for *In Camera* Treatment, IT IS HEREBY ORDERED that the following documents are to be provided *in camera* treatment under 16 C.F.R. § 3.45 for five years from the date of this order.

<b>Exhibit No.</b>	<b>Document Title/Description</b>	<b>Date</b>	<b>Beginning Bates No.</b>	<b>Ending Bates No.</b>
RX0579	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000002	FRIS00000002
RX0580	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000003	FRIS00000003
RX0581	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000004	FRIS00000004
RX0582	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000005	FRIS00000005
RX0583	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000006	FRIS00000006
RX0584	Frisco Lender Services, LLC data spreadsheets in response to Constantine Cannon 1/17/2018 subpoena	2/7/2018	FRIS00000007	FRIS00000007

**ORDERED:**

\_\_\_\_\_  
 The Honorable D. Michael Chappell  
 Chief Administrative Law Judge

Date: