

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

9107-4021 QUÉBEC, INC.,

a corporation, also d/b/a Med Provisions,
and Pronto Meds,

and

SAMEER MALHOTRA,

individually and as an officer of the corporation,

and

POOJA MALHOTRA,

individually and as an officer of the corporation,

Defendants.

Civ. No. 1:08 CV 1051

Hon. Donald C. Nugent

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT (UNOPPOSED)

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff Federal Trade Commission hereby respectfully moves the Court for leave to file an AMENDED COMPLAINT, a draft copy of which is attached hereto.¹ The AMENDED COMPLAINT adds two individual defendants, Ravinder Chawla and Amit Malhotra. It also adds two new corporate defendants, Zonecom Technologies, Inc. and 9107-5424 Québec, Inc. The new complaint maintains the counts and allegations of the original complaint and also alleges that the three corporate defendants acted as a common enterprise. Counsel for plaintiff has conferred with counsel for the original defendants and is authorized to state that the original defendants do not oppose this

¹ Rule 15 provides that a party may amend its pleading once as a matter of course at any time before a responsive pleading is served; “[o]therwise, a party may amend the party’s pleading only by leave of court . . . and leave shall be freely given when justice so requires.” Fed. R. Civ. P. 15. As two of the Defendants have filed responsive pleadings, leave of Court is required.

motion.

DATE: August 12, 2008

Respectfully submitted,

/s/ Michael Milgrom

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CERTIFICATE OF SERVICE

I certify that on August 12, 2008, the attached Motion for Leave to File Amended Complaint with attachments was filed electronically. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system, including the counsel listed below. Parties may access this filing through the Court's system.

Hector E. Lora, Esq.
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Hollywood, Florida 33020
Attorney for all Defendants

Respectfully submitted:

Date: August 12, 2008

/s/ Michael Milgrom

Michael Milgrom
Sara DePaul
Attorneys for Plaintiff