

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION



In the Matter of)
)

ECM BioFilms, Inc.,)
a corporation, also d/b/a)
Enviroplastics International)

Docket No. 9358

PUBLIC DOCUMENT

COMPLAINT COUNSEL'S MOTION TO EXTEND THE WORD COUNT LIMIT

Pursuant to Rule § 3.22(f), Complaint Counsel asks the Court to extend the applicable word count limit by 2500 words with respect to the attached Motion To Certify Scheduling Issues to the Commission and Request for Interim Relief, and to afford Respondent the same extension with respect to its response. As long as the extension applies to both parties, Respondent does not object to the relief sought herein.

This relief is appropriate for several reasons. First, the attached Motion reasonably could be divided into two separate motions (one addressing the certification, and another addressing interim scheduling relief). Under Rule § 3.22(c), this alternative structure would entitle Complaint Counsel to submit two separate 2500-word filings. Second, because the Commission lacks the Court's experience with this litigation's procedural history, the filing requires additional detail. Third, the substantial importance of the issues raised warrants additional space. Finally, because the relief sought herein is reciprocal, there is no prejudice to Respondent. Accordingly, good cause exists to extend the word count limit.

Dated: March 18, 2014

Respectfully submitted,

A handwritten signature in black ink, appearing to be "Katherine Johnson".

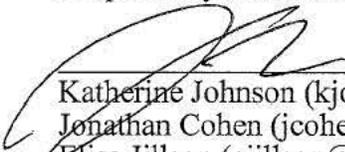
Katherine Johnson (kjohnson3@ftc.gov)
Jonathan Cohen (jcohen2@ftc.gov)
Elisa Jillson (ejillson@ftc.gov)
Federal Trade Commission
600 Pennsylvania Ave., N.W. M-8102B
Washington, DC 20580
Phone: 202-326-2185; -2551; -3001
Fax: 202-326-2551

MEET AND CONFER CERTIFICATION

The undersigned counsel certifies that Complaint Counsel conferred with Respondent's counsel in a good faith effort to resolve by agreement the issues raised by Complaint Counsel's Motion To Extend the Word Count Limit. Specifically, on March 18, 2014, Complaint Counsel (Katherine Johnson, Jonathan Cohen, and Elisa Jillson) and Respondent's Counsel (Peter Arhangelsky and Lou Caputo) communicated by telephone regarding the issues this motion raises, and were able to reach an agreement. As long as the extension applies to both parties' filings, Respondent does not object to the relief sought herein.

Dated: March 18, 2014

Respectfully submitted,



Katherine Johnson (kjohnson3@ftc.gov)
Jonathan Cohen (jcohen2@ftc.gov)
Elisa Jillson (ejillson@ftc.gov)
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[PROPOSED]
ORDER GRANTING COMPLAINT COUNSEL'S MOTION
TO EXTEND THE WORD COUNT LIMIT

This matter having come before the Chief Administrative Law Judge on March 18, 2014, upon a Motion by Complaint Counsel, and having considered all related submissions, and for good cause appearing, it is hereby ORDERED that Complaint Counsel's Motion Is GRANTED.

The Court ORDERS that the word count applicable to Complaint Counsel's Motion To Certify Scheduling Issues to the Commission and Request for Interim Relief is extended by 2500 words.

It is FURTHER ORDERED that the word count applicable to ECM's response thereto is also extended by 2500 words.

SO ORDERED:

D. Michael Chappell
Chief Administrative Law Judge

Date:

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2014, I caused a true and correct copy of the foregoing to be served as follows:

One electronic copy through the FTC's e-filing system, and one electronic courtesy copy to the **Office of the Secretary:**

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Room H-159
Washington, DC 20580
Email: secretary@ftc.gov

One electronic courtesy copy and one paper courtesy copy to the **Office of the Administrative Law Judge:**

The Honorable D. Michael Chappell
Chief Administrative Law Judge
600 Pennsylvania Ave., NW, Room H-110
Washington, DC 20580

One electronic copy to **Counsel for the Respondent:**

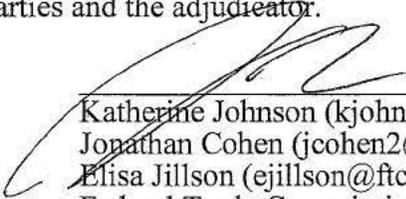
Jonathan W. Emord
Emord & Associates, P.C.
11808 Wolf Run Lane
Clifton, VA 20124
Email: jemord@emord.com

Peter Arhangelsky
Emord & Associates, P.C.
3210 S. Gilbert Road, Suite 4
Chandler, AZ 85286
Email: parhangelsky@emord.com

Lou Caputo
Emord & Associates, P.C.
3210 S. Gilbert Road, Suite 4
Chandler, AZ 85286
Email: lcaputo@emord.com

I further certify that I possess a paper copy of the signed original of the foregoing document that is available for review by the parties and the adjudicator.

Date: March 18, 2014


Katherine Johnson (kjohnson3@ftc.gov)
Jonathan Cohen (jcohen2@ftc.gov)
Elisa Jillson (ejillson@ftc.gov)
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Washington, DC 20580
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