

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

\_\_\_\_\_) )  
In the Matter of ) )  
Natalia Lynch, ) ) Docket No. 9423  
Appellant. ) )  
\_\_\_\_\_)

**ORDER: (1) GRANTING MOTION TO STRIKE IN PART; AND  
(2) GRANTING LEAVE TO FILE REVISED PROPOSED FINDINGS OF FACT**

Appellant Lynch has filed a motion to strike Reply Findings of Fact and Conclusions of Law filed by the Horseracing Integrity and Safety Authority (the “Authority”). Lynch asserts that the Authority’s Reply Findings of Fact exceed the word limit contained in FTC Rule 1.146 (c)(4)(ii), as further construed in my July 17, 2024 Order on Post-Trial Filings.

The Authority filed an opposition to Lynch’s motion, disputing certain of Lynch’s word count calculations, as well as Lynch’s interpretation of the word limit provisions of the July 17 Order. The Authority nevertheless acknowledged that its Reply Findings of Fact exceeded the limit of 2500 words, and sought permission to file a revised, compliant, version of its Reply Findings of Fact, which it included with its opposition as Exhibit A.

Because the Reply Findings of Fact filed by the Authority exceeded the 2500-word limit, Lynch’s motion is **GRANTED IN PART**.

It is hereby **ORDERED** that the Authority shall, no later than 10 a.m. Eastern on September 3, 2024, file the document attached as Exhibit A to the Authority’s Opposition to Appellant’s Motion to Strike with the following changes:

(1) Identifying the paper on pages 1 and 4 of Exhibit A, as “AUTHORITY’S REPLY TO APPELLANT’S PROPOSED FINDINGS OF FACT (September 3, 2024 Revision),” and inserting a footer included on each individual page, “September 3, 2024 Revision” (all excluded from the word count);

(2) Correcting the numbering and format errors on page 6; and

(3) Noting, on the first (introductory) paragraph on page 5, any omission in responding to an individual Proposed Finding of Fact and the reason for it (the addition not included in the word count).

There shall be no other changes to Exhibit A. All other relief requested in Appellant's motion to strike is **DENIED**.

**ORDERED:**

*Jay L. Himes*  
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Jay L. Himes  
Administrative Law Judge

Date: August 30, 2024