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

In the Matter of

Caremark Rx, LLC,

Zinc Health Services, LLC,

Express Scripts, Inc.,

Evernorth Health, Inc.,

Medco Health Services, Inc.,

Ascent Health Services LLC,

OptumRx, Inc.,

OptumRx Holdings, LLC, and

Emisar Pharma Services LLC,

Respondents.

Docket No. 9437

[PROPOSED] STIPULATION AND PROTOCOL GOVERNING DEPOSITIONS

Pursuant to Amended Scheduling Order #2, Paragraph 14(c), Complaint Counsel and each of the Respondents to the above-captioned matter (the “Action”), stipulate and agree as follows:

1. This Stipulation and Protocol Governing Depositions (the “Protocol”) will govern, subject to Court approval, depositions of all fact and expert witnesses in this Action as a supplement to rules and procedures that may apply, including those set forth in 16 C.F.R. Part 3, 16 C.F.R. Part 4, the Protective Order Governing Confidential Material dated October 1, 2024, and the Amended Scheduling Order #2 dated September 29, 2025 (the “Amended Scheduling Order”).

PUBLIC**I. Definitions**

2. “Attending Counsel” shall mean counsel for a Party or a Nonparty who is not Deposing Counsel or Defending Counsel, but who is attending a Deposition.

3. “Defending Counsel” shall mean counsel for the witness whose Deposition has been noticed pursuant to this Protocol. In the event a Nonparty Witness does not have counsel, then “Defending Counsel” shall mean the Witness.

4. “Deposing Counsel” shall mean counsel for the Party or Parties who noticed a Deposition in this Action. For clarity, Deposing Counsel does not include counsel who does not notice or cross-notice a Deposition but is afforded reasonable time to ask follow-up questions of the Witness.

5. “Nonparty” and “Nonparty Witness” shall mean all natural or legal persons that are neither Parties nor persons retained by any of the Parties or the Parties’ counsel and from whom a Party is seeking testimony at a Deposition in this Action.

6. “Noticing Party” shall mean a Party that noticed a Deposition of a Witness pursuant to Rule 3.33, 16 C.F.R. § 3.33.

7. “Party” shall mean Complaint Counsel and each “Respondent group,” which is defined in Footnote 1 of the Amended Scheduling Order as “Respondents that are represented by the same counsel.”

8. “Platform” shall mean any computer program, application, or other technology or combination of technologies that enables the Parties to conduct a Deposition in accord with this Protocol.

9. “Deposition” shall mean any deposition by oral examination conducted pursuant to Rule 3.33 or Rule 3.31A(d), 16 C.F.R. §§ 3.33 & 3.31A(d).

10. “Witness” shall mean the person, including Nonparties, whose Deposition has been noticed in this Action or any person designated to appear to give testimony on behalf of a Party or Nonparty pursuant to Rule 3.33(c)(1), 16 C.F.R. § 3.33(c)(1).

II. Depositions

11. A Party shall notice a Deposition in this Action by stating its intent to take a Deposition either remotely or in-person in its original or amended notice or subpoena of a person, Party, or Nonparty for deposition by oral examination pursuant to 16 C.F.R. § 3.33. For any Deposition that proceeds in person, the Noticing Party shall make a Platform available for Parties and other persons who elect to attend remotely, unless the Parties and Witness agree a Platform is unnecessary.

12. The Noticing Party shall serve a copy of this Protocol with any subpoena for a Deposition. If any Witness objects to any provision in this Protocol, including a reasonable objection to appearing in person or remotely for the Deposition, it must notify the Noticing

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Party, in writing, of the objection within five (5) business days of receiving this Protocol. In the event any Witness raises a reasonable objection to appearing in person for a Deposition, the Parties and, as applicable, any relevant Nonparty shall negotiate in good faith about the format of the Deposition. If the Parties cross-notice a Nonparty for a Deposition, and the Parties disagree or the Nonparty disagrees about whether to proceed remotely or in person, the preference of the Nonparty shall prevail, except that for depositions of any employees, corporate representatives, or former employees of Novo Nordisk, Inc., Sanofi S.A., Eli Lilly Inc., Viatris Inc., or Biocon Biologics Inc., ten depositions total from among these Nonparties (to be selected by Respondents) shall be in person if any Party notices the deposition to proceed in person. Consistent with Paragraph 11, in the event any deposition is in person under this Paragraph, a Platform will be made available for any attorney wishing to proceed remotely.

13. Deposing Counsel or Defending Counsel may elect to appear in person for a Deposition (i.e., be physically present in the same room with the Witness), subject to the terms of Paragraph 12. If Deposing Counsel or Defending Counsel elect to appear in person for a Deposition, they shall provide all Parties with notice of their intent no later than five (5) business days in advance of the Deposition. In the event Deposing Counsel or Defending Counsel provide such notice, Attending Counsel may also elect to appear in person for the same Deposition and, if they so elect, shall provide all Parties with notice of their intent no later than (3) business days in advance of the Deposition. Notice pursuant to this Paragraph shall identify the number of persons who intend to appear in person at the Deposition and participants providing such notices shall attempt in good faith to identify those persons.

14. In the event any Witness appears in person for a Deposition and any counsel elects to attend remotely, Noticing Party's counsel shall make reasonable accommodations, including providing use of a Platform, to enable remote attendance for those who do not appear in person.

15. The Parties stipulate that a Witness's oath or affirmation may be administered remotely for any Deposition. The place of examination is the location of the Witness.

16. Absent a contrary agreement by all Parties, the court reporter may participate remotely and will not be required to be physically present in the same room or the same jurisdiction as the Witness. A Deposition shall be deemed to have been conducted before an appropriate officer pursuant to 16 C.F.R. § 3.33(a), as long as that officer attends the Deposition through the same Platform as Defending Counsel and Deposing Counsel. Except that in the case of in person depositions of employees, corporate representatives, or former employees of Novo Nordisk, Inc., Sanofi S.A., Eli Lilly Inc., Viatris Inc., and Biocon Biologics Inc., discussed in Paragraph 12, the court reporter will be physically present in the same room as the Witness, unless all Parties agree otherwise.

17. The Parties expressly waive all objections to the admissibility of any testimony given during a Deposition taken pursuant to Paragraph 11 based solely on the fact it was taken remotely or using a Platform. Testimony given during a Deposition, including both the transcript and video record, if any, may be used at a trial, at hearings, in motions, or in other modes in

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these proceedings to the same extent that in-person deposition testimony may be used at trial, at hearings, in motions, or in other modes in these proceedings.

III. Technical Difficulty During Depositions

18. If a technical difficulty arises during the taking of a Deposition, either the Defending Counsel or Deposing Counsel may order the Deposition suspended (i.e., go off the record). Defending and Deposing Counsel shall then meet and confer immediately, by telephone or other means, to determine whether the Deposition can proceed or should be continued to a future date. If technical difficulties make the completion of a Deposition impracticable, the Deposition shall be suspended and the Parties and, as applicable, the Nonparty shall negotiate in good faith to resume the Deposition at the earliest opportunity.

19. If a Deposition is suspended because of a technical difficulty, time spent addressing the technical difficulty shall not be counted against record time for that Deposition.

20. Due to known technical issues, the Parties agree that no person who is participating in a Deposition—including the Witness, Deposing Counsel, and Defending Counsel—shall use an iPad, tablet, or similar device to participate in a Deposition, except that participants who have requested a real-time live feed of the Deposition transcription may view that real-time live feed using any suitable device.

IV. Deposition Technology

21. The first Noticing Party that noticed a Deposition under this Protocol shall be responsible for arranging the taking of the Deposition, including ensuring that email invitations to attend the Deposition are sent to the Witness, the court reporter, and any counsel who, no later than four (4) business days before the Deposition, shall provide their email addresses to the Noticing Party. In lieu of providing the Witness's email address, Defending Counsel may elect, upon notice to the Noticing Party, to forward the email invitation and other relevant information to the Witness directly.

22. Depositions shall be recorded by stenographic means at the expense of the first Noticing Party. Each Party will bear its own costs for copies of transcripts and copies of video recordings of any deposition.

23. Any Party may elect to request that the court reporting service record the Deposition by audiovisual means but, if it so elects, any such Party shall (a) provide notice to all other Parties pursuant to Paragraph 14(c) of the Amended Scheduling Order and (b) bear their own costs for the recording. Any video recording of the Witness shall be conducted with the camera focused exclusively on the Witness, not capturing Deposing Counsel, Defending Counsel, or any of the other attendees. The only recording of the Deposition, whether audio or visual, will be through the court reporting service, and the Parties will instruct the court reporter to record only when the Deposition is on the record. The court reporter will disable any other "record" function in any secure videoconferencing Platform, and the Parties and any other Deposition participants will not use any other means to record the Deposition.

24. Any Platform that a Party selects for Depositions must:

- a. Be web-based and not require the installation of any applications for use;
- b. Be secure and utilize end-to-end encryption videoconferencing;
- c. Limit access to the Platform only to those participants agreed upon by the Parties;
- d. Allow for the court reporter to accurately record, and for all participating counsel and the court reporter to hear and see, the Witness, Deposing Counsel, Defending Counsel, Attending Counsel, and any exhibits that are introduced on the Platform during the Deposition; and
- e. Allow the Witness and Defending Counsel to each have a complete electronic copy and personal control of each exhibit when it is introduced through the Platform.

25. A Party may not use a Platform that is not compatible with another Party's security or technology requirements. If a Platform is not compatible with any Party's security or technology requirements, that Party must notify the other Party at least five (5) business days prior to the first-noticed Deposition.

26. The Platform for a Deposition shall be configured such that any private chat feature is disabled. Breakout room features may be enabled only for breaks and recesses off the record. Conversations in the breakout rooms shall not be recorded. All other chat, instant message, e-mail, and/or texting features that may be visible to or used to communicate with the Witness without such communications being visible to the rest of the Deposition participants are prohibited and shall be closed or disabled during the Deposition in a manner that prevents the Witness from receiving messages, alerts, and notifications through such features.

27. The court reporter will make a real-time live feed of the Deposition transcript available to all Deposition participants other than the Witness, who is not permitted to use a real-time live feed. Parties and Nonparties who request a real-time live feed of the Deposition shall bear their own costs.

28. The Parties may conduct a joint test of the Platform at least three (3) business days prior to the taking of the first Deposition using that Platform. A Party that fails to request or participate in such a test waives any objections to the use of the Platform. Upon the request by the Witness or any Party, a Party whose Platform is to be used to conduct the Deposition shall arrange for the Witness and all participating counsel to have the ability to participate in a test run of the Platform.

29. Deposition participants other than the Witness are responsible for ensuring that they have the proper hardware, software, and other equipment to participate in the Deposition. Defending Counsel shall ensure that the Witness has access to technology that meets the minimum standards required by the Platform, including but not limited to a computer with an internet speed of at least 1.5 Megabits per second; a webcam; and a phone, USB microphone,

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headphones with a microphone, or other technology sufficient to ensure the transmission of high-quality audio (and video, if applicable) through the Platform.

V. Exhibits

30. Deposing Counsel shall be responsible for ensuring that any exhibits that they wish to mark and use at a Deposition can be shown to the Witness in a manner that enables the Witness, the court reporter, and any participating counsel to review the exhibits in their entirety over the course of the Deposition.

31. If the Platform does not permit the court reporter to mark exhibits remotely, Deposing Counsel shall be responsible for marking exhibits and ensuring that such marks are communicated to the court reporter and all participating counsel on the record during the Deposition.

32. Deposing Counsel shall mark and use all exhibits through the Platform, which enables Deposing Counsel to share exhibits in their entirety with the Witness, court reporter, Defending Counsel, and Attending Counsel.

- a. Deposing Counsel shall attempt in good faith to provide in advance of a Deposition any exhibits that are too large or otherwise technically infeasible to use through the Platform. Deposing Counsel may provide such exhibits by emailing a compressed .zip file, secure FTP, or other secure electronic link of the exhibits in their entirety to the Witness, court reporter, Defending Counsel, and Attending Counsel no later than 3:00 p.m. Eastern Time the business day prior to the start of the Deposition. Prior to the commencement of the Deposition, the recipients may only open the .zip file, FTP, or electronic link for the limited purpose of ensuring that they are able to access the exhibits. Recipients shall not open individual exhibits prior to the commencement of the Depositions and shall not open any exhibit at any time that Deposing Counsel did not use or introduce during the Deposition. If any exhibits are too large or otherwise technically infeasible to use through the Platform and cannot be provided by email, Deposing Counsel shall provide notice no later than 3:00 p.m. Eastern Time the business day prior to the start of the Deposition and the Parties shall negotiate in good faith for a reasonable alternative arrangement.
- b. Deposing Counsel and any other Counsel examining the Witness, respectively, shall be responsible for ensuring that all exhibits or unused documents are deleted and completely removed from the Platform at the conclusion of the Deposition. Nonparty Witnesses and their Defending Counsel shall not retain any copies of documents sent in advance of or used during the Deposition.

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33. If Deposing Counsel and the Witness both appear in person for a Deposition, Deposing Counsel may also elect to use printed hard copies of an exhibit with the Witness, provided that Deposing Counsel shall be responsible for ensuring that any hard copy is an exact duplicate of the exhibit marked and used through the Platform pursuant to Paragraph 32. For clarity, the court reporter shall accept as part of the Deposition's record the version of the exhibit marked and used through the Platform pursuant to Paragraph 32, and any Party may raise an objection at any time during this Action to any latent differences between that version and the hard copy used with the Witness. For depositions of expert Witnesses, Defending Counsel may provide the expert Witness a hard copy of any report served by that expert Witness in the action.

34. If Deposing Counsel expects to mark and use any voluminous exhibits during a Deposition, they may provide them to Defending Counsel in advance of the Deposition. If Deposing Counsel provides any such voluminous exhibits, Deposing Counsel can request that the Witness review the exhibit off the record so that the Witness does not spend significant record time during the Deposition reviewing those exhibits.

VI. Deposition Conduct

35. The Parties shall negotiate in good faith to set reasonable start times for Depositions and to agree on any other arrangement that may be required, including any arrangement related to a Witness appearing for a Deposition in person. No Witness shall be required to travel to an inconvenient location (e.g., out of state or beyond where the Witness customarily lives or works) for any in-person deposition.

36. All persons attending a Deposition shall identify themselves and their Party or Nonparty affiliation on the record at the beginning of the Deposition or when they enter the Deposition.

37. If a Deposition proceeds using a Platform, Deposing Counsel, the Witness, and Defending Counsel must each be individually logged onto the Platform and using their own exclusive camera with their faces visible by video at all times while on the record during a Deposition. If the Deposing Counsel is attending remotely, any other persons who are appearing in person for a Deposition must have their faces visible by video on the Platform at all times while on the record during a Deposition. All other persons attending a Deposition through the Platform shall have their cameras turned off while on the record.

38. To ensure the best image quality and sound while testifying through the Platform, the Witness must use their own camera and equipment that is not shared with others in the same room as the Witness. In the event a videographer is present, the Witness may also use a camera and any other equipment necessary for the videographer to obtain an audiovisual recording of the Deposition.

39. All persons attending a Deposition who do not have an immediate need to speak shall ensure that their audio is muted.

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40. If privileged information is disclosed during a Deposition inadvertently as a result of a technical disruption or other technical issue, such disclosure shall not be deemed a waiver of privilege.

41. The Witness shall not communicate with any person, including Defending Counsel, by chat, email, text message, or any other means while on the record during the Deposition. When a Deposition is off the record, including during breaks, the Witness may communicate by any means permitted by the law of the jurisdiction where the Witness is located. The Witness may consult privately with Defending Counsel for the purpose of determining whether a privilege should be asserted, so long as the Witness or Defending Counsel states on the record that such consultation is occurring. For the avoidance of any doubt, and in keeping with normal deposition practice, Deposing Counsel, Defending Counsel, and a Nonparty Witness's counsel may engage in private communications or discussion amongst themselves during a Deposition.

42. During the Deposition, including any breaks and recesses off the record, and absent the express consent of counsel for all Parties, any Witness other than a corporate designee shall not consult, review, read, have before them, or otherwise access any outside sources of information related to their testimony, including but not limited to email, chat, text, instant message, Internet web page, blog, social media, video, audio, or any other material, except documents presented to the Witness as exhibits. For Depositions of corporate designees, the Witness testifying as a corporate designee may refer to any document that Defending Counsel used to prepare them for testimony on the noticed topics, including during any breaks and recesses off the record, provided that Defending Counsel produces copies of any such documents to all Parties, or identifies any such documents if they have already been produced in the Action, with sufficient time for Deposing Counsel to reasonably review them before concluding the Deposition. For Depositions of expert Witnesses, the expert Witness may refer to any report served by that expert Witness in the Action, including during any breaks and recesses off the record.

43. No Party or person other than the court reporter, videographer, and/or audio recorder shall record any portion of the Deposition. This prohibition extends to capturing images, audio, or footage by any means, including but not limited to taking screenshots, audio recordings, videos, or pictures of the proceedings.

44. All persons attending a Deposition are reminded that the typical rules of professionalism and etiquette during depositions still apply. All persons attending Depositions taken pursuant to this Protocol shall undertake best efforts to ensure that they can do so in a space that is relatively free from distractions that would interfere with the Deposition, including by silencing all electronic devices, refraining from sidebar conversations, and otherwise ensuring that background noise is kept to a minimum.

45. In the event any Witness appears in person for a Deposition pursuant to Paragraphs 12 and 13, the only other persons who may be physically located in the same room as the Witness are those who are identified in the notice required under Paragraph 13, and in no

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event may exceed (a) Deposing Counsel and a reasonable number of affiliated personnel; (b) Defending Counsel and a reasonable number of affiliated personnel; (c) Attending Counsel and one affiliated person; and (d) a reasonable number of non-attorneys who are present solely for the purpose of providing technical assistance.

VII. Reservation of Rights

46. By entering into this Protocol, the Parties do not intend to limit their rights to seek relief from the Court if, at any time, any one or all of them determine that Depositions pursuant to Paragraph 11 are or have become impractical or prejudicial.

47. By entering into this Protocol, the Parties do not intend to waive any rights, protections, or applicable procedures under 16 C.F.R. Part 3, 16 C.F.R. Part 4, or any Order entered in this Action.

48. Based on their experience under this Protocol and the needs of individual witnesses, (a) the Parties, or the Parties and any Nonparty Witness, may stipulate to modifications of this Protocol applicable to an individual deposition; or (b) the Parties may stipulate and submit to the Court for its approval modifications to this Protocol applicable to all Depositions.

Dated: November 20, 2025

Respectfully submitted,

/s/ Rebecca L. Egeland

Rebecca L. Egeland

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[PROPOSED] ORDER

On November 20, 2025, Complaint Counsel and Respondents filed a Stipulation and Protocol Governing Depositions (“Stipulation”) and jointly request that the Stipulation be entered as an order in this matter.

The joint request is GRANTED, and it is hereby ORDERED that the Stipulation shall be entered as an order in this matter.

ORDERED:

Date:

Jay L. Himes
Administrative Law Judge

PUBLIC**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2025, I caused the foregoing document to be filed electronically using the FTC's E-Filing System, which will send notification of such filing to:

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Clerk of the Court

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I certify that no portion of the filing was drafted by generative artificial intelligence ("AI") (such as ChatGPT, Microsoft Copilot, Harvey.AI, or Google Gemini). I also certify that I caused the foregoing document to be served via email to:

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