

FEDERAL TRADE COMMISSION  
WASHINGTON, D.C. 20580

## NOTICE OF APPEARANCE



<b>CASE NAME</b>	<b>FILE/DOCKET NUMBER</b>
In the Matter of Philip Serpe	D09441

Pursuant to Section 4.1 of the Commission's Rules of Practice, I (we) am (are) entering in the above proceeding the appearance of

- ☐ counsel supporting the complaint (Complete Items 1, 3, 4, and 5 below)
- ☒ counsel or representative for the respondent (Complete Items 1, 2, 4, and 5 below)
- ☐ counsel or representative for a third party (Complete Items 1, 2, 4, and 5 below)

1. COUNSEL OR REPRESENTATIVE	2. RESPONDENT(S) OR THIRD PARTY(IES)
<p>Include the name, address, email address, and telephone number of each counsel or representative entering an appearance in the above proceeding,</p> <p>Kerry Hunt TN Bar No. 037742 PACIFIC LEGAL FOUNDATION 3100 Clarendon Blvd., Ste. 1000 Arlington, VA 22201 Ph: (901) 590-6372 Email: KerryHunt@pacificlegal.org</p> <p>(Attorney Kerry Hunt is being added to the other attorneys for Serpe who have already appeared as below):</p> <p>Oliver J. Dunford Fla. Bar No. 1017791 PACIFIC LEGAL FOUNDATION 4440 PGA Blvd., Ste. 307 Palm Beach Gardens, FL 33410 Ph: (916) 503-9060 Email: ODunford@pacificlegal.org</p> <p>Joshua M. Robbins PACIFIC LEGAL FOUNDATION 3100 Clarendon Blvd., Ste. 1000 Arlington, VA 22201 Ph: 202-945-9524 Email: JRobbins@pacificlegal.org</p> <p>Christopher Condon D.C. Bar No. 90017688 PACIFIC LEGAL FOUNDATION 3100 Clarendon Blvd., Ste. 1000 Arlington, VA 22201 Ph: 202.670.3959 Email: CCondon@pacificlegal.org</p>	<p>Include the address and telephone numbers of all persons, partnerships, corporations, or associations on whose behalf this Notice of Appearance is being filed.</p> <p>Philip Serpe (contacted through counsel)</p>

<b>3. ASSOCIATE/ASSISTANT DIRECTOR</b>	
<b>4. SIGNATURE OF SENIOR COUNSEL</b>	<b>5. DATE SIGNED</b>
/s/ Kerry Hunt	1/22/2026

Return this form to: Federal Trade Commission  
Room H-113  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

**PUBLIC**

**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Andrew N. Ferguson, Chairman  
Mark R. Meador**

**IN THE MATTER OF**

**PHILIP SERPE,**

**Appellant.**

**MATTER NO. 9441**

**STATEMENT OF GOOD STANDING PURSUANT TO 16 C.F.R. § 4.1**

In connection with the Notice of Appearance filed on January 22, 2025, and pursuant to 16 C.F.R. § 4.1(d), I state that I am eligible to practice before the Commission as counsel for Philip Serpe. I am admitted to practice before the United States District Court for the District of Colorado; the United States Courts of Appeals for the Fifth Circuit and Ninth Circuit. I am a member in good standing with the Tennessee Bar (TN No. 037742). As requested by 16 C.F.R. § 4.1 (d), I further state that I am a member of good standing within the legal profession.

DATED: January 22, 2026.

Respectfully submitted,

/s/ Kerry Hunt

KERRY HUNT

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**PUBLIC**

*Attorney for Philip Serpe*

**PUBLIC****CERTIFICATE OF SERVICE**

Pursuant to 16 CFR § 1.146(a) and 16 CFR § 4.4(b), I certify that on January 22, 2026, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of the filing. A courtesy copy will be sent via email to the following:

<p>April Tabor Office of the Secretary Federal Trade Commission 600 Pennsylvania Avenue NW Suite CC-5610 Washington, DC 20580 electronicfilings@ftc.gov</p>	<p>Hon. D. Michael Chappell Office of Administrative Law Judges Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580 oalj@ftc.gov electronicfilings@ftc.gov</p>
<p>James Bunting Tyr LLP 488 Wellington Street West, Suite 300-302 Toronto, ON M5V 1E3 jbunting@tyrllp.com</p>	<p>Michelle C. Pujals Allison Farrell 4801 Main Street, Suite 350 Kansas City, MO 64112-2749 afarrell@hiwu.org <i>Counsel for HIWU</i></p>
<p>John L. Forgy 830 Vermillion Peak Pass Lexington, KY 40515 johnforgy1@gmail.com <i>Counsel for HISA</i></p>	<p>Bryan H. Beauman Rebecca C. Price Sturgill Turner Barker &amp; Moloney, PLLC 333 W. Vine St., Ste 1500 Lexington, KY 40507 bbeauman@sturgillturner.com rprice@sturgillturner.com <i>HISA Enforcement Counsel</i></p>

/s/ Kerry Hunt

KERRY HUNT