

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

)	
In the Matter of:)	
)	Docket No. 9408
Intuit Inc., a corporation)	
)	

**JOINT MOTION FOR EXTENSION OF TIME FOR COLLIER.SIMON TO FILE
MOTION TO QUASH OR TO LIMIT FEDERAL TRADE COMMISSION’S SUBPOENA
*DUCES TECUM***

Non-Party Collier.Simon and Complaint Counsel for the Federal Trade Commission (“Complaint Counsel”) jointly move to extend the time for Collier.Simon to file a motion to quash or to limit a subpoena served on it by Complaint Counsel. In support thereof, Collier.Simon and Complaint Counsel state as follows:

1. On or about October 14, 2022, Complaint Counsel sent Collier.Simon, via FedEx, a Subpoena *Duces Tecum* (the “Subpoena”) containing requests for documents, with a response date of November 7, 2022. Collier.Simon received the Subpoena on October 17, 2022.
2. Pursuant to the Federal Trade Commission’s Rules of Practice, 16 C.F.R. §§ 3.34(c), 4.4(b)(2), Collier.Simon originally had ten (10) days in which to file a motion to quash or to limit the Subpoena from the date of delivery by courier, resulting in a deadline of October 27, 2022.
3. Because counsel for Collier.Simon and Complaint Counsel were engaged in negotiations regarding the scope of the Subpoena and the time required for Collier.Simon to produce responsive documents, on October 27, 2022, the parties jointly moved for an extension of time until November 10, 2022 for Collier.Simon to file a motion to quash or to limit the Subpoena. This motion was granted on October 28, 2022.

4. Given their ongoing negotiations, on November 8, 2022, the parties again jointly moved for an extension of time until November 28, 2022 for Collier.Simon to file a motion to quash or to limit the Subpoena. The motion was granted the same day.

5. Counsel for Collier.Simon and Complaint Counsel are currently still engaged in negotiations regarding the Subpoena and have been making progress towards a resolution. To facilitate those negotiations, Collier.Simon and Complaint Counsel have agreed that Collier.Simon shall have additional time in which to file a motion to quash or limit the Subpoena should Collier.Simon and Complaint Counsel be unable to resolve all issues regarding Collier.Simon's response to the Subpoena.

6. Therefore, Collier.Simon and Complaint Counsel request that this Court grant Collier.Simon until January 13, 2023 to file a motion to quash or to limit the Subpoena.

7. This extension has been agreed upon in order to afford Collier.Simon's counsel sufficient additional time to negotiate with Complaint Counsel regarding reasonable limitations and modifications of the Subpoena to reduce the burden on Collier.Simon of responding and thereby to potentially avoid the necessity of filing a motion to quash or to limit the Subpoena.

Dated: November 25, 2022

Respectfully submitted,

/s/ Christine Stoddard

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Attorneys for Complaint Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2022, I filed the foregoing document electronically using the FTC's E-Filing system, which will send notification of such filing to:

The Honorable D. Michael Chappell
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Washington, DC 20580

April Tabor
Office of the Secretary
Federal Trade Commission
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I further certify that on November 25, 2022, I caused the foregoing document to be served via email to:

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Respectfully submitted,

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[PROPOSED] ORDER GRANTING JOINT MOTION FOR EXTENSION OF TIME

Non-Party Collier.Simon and Complaint Counsel for the Federal Trade Commission (“FTC”) filed a joint motion to extend the time for Collier.Simon to file a motion to quash or to limit a subpoena *duces tecum* served on Collier.Simon by Complaint Counsel (“Joint Motion”).

Upon review and consideration of the Joint Motion, the Joint Motion is GRANTED. It is hereby ORDERED that Collier.Simon’s deadline to file a motion to quash or to limit the FTC’s subpoena *duces tecum* is hereby extended until and including January 13, 2023.

ORDERED:

Hon. D. Michael Chappell
Chief Administrative Law Judge

Date: _____