

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

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

JOINT MOTION FOR EXTENSION OF TIME FOR COLLIER.SIMON TO SEEK *IN CAMERA* TREATMENT OF DOCUMENTS

Pursuant to Rule 4.3(b) of the Federal Trade Commission’s Rules of Practice, 16 C.F.R. § 4.3(b), non-Party Collier.Simon and Complaint Counsel for the Federal Trade Commission (“Complaint Counsel”) jointly move to extend the time for Collier.Simon to seek *in camera* treatment of documents it produced, which may be introduced at the hearing in this matter. In support thereof, Collier.Simon and Complaint Counsel state as follows:

1. On or about October 14, 2022, Complaint Counsel sent Collier.Simon a Subpoena *Duces Tecum* (the “Subpoena”) containing requests for documents. Collier.Simon received the Subpoena on October 17, 2022.
2. Counsel for Collier.Simon and Complaint Counsel thereafter engaged in negotiations regarding the scope of the Subpoena and the time required for Collier.Simon to produce responsive documents. After reaching agreement, Collier.Simon began collecting and preparing documents for production.
3. Collier.Simon has been working diligently to identify and collect documents responsive to the Subpoena, which have yet to be produced. Collier.Simon anticipates that many or all of these documents will be designated Confidential pursuant to the Protective Order entered in this matter.
4. On January 20, 2023, pursuant to FTC Rule 3.45(b) and paragraph 10 of the Protective Order in this matter, Complaint Counsel provided notice to Collier.Simon of its intent to possibly

introduce any and all material produced or to be produced by Collier.Simon into evidence at the hearing.

5. Pursuant to the First Revised Scheduling Order entered in this proceeding, the deadline to move for *in camera* treatment of proposed trial exhibits is February 10, 2023.

6. Given the significant number of documents currently being collected, and the time needed to identify which potential trial exhibits may require confidential treatment, Collier.Simon and Complaint Counsel agreed that Collier.Simon (or any other affected party) should have until March 10, 2023 to move for *in camera* treatment of any documents produced by Collier.Simon that may be introduced at the hearing.

7. Therefore, Collier.Simon and Complaint Counsel request that this Court grant Collier.Simon until March 10, 2023 to seek *in camera* treatment of trial exhibits.

8. Good cause exists for this extension to afford Collier.Simon sufficient time to identify which of the documents produced requires *in camera* treatment.

Dated: February 6, 2023

Respectfully submitted,

/s/ Christine Stoddard

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Attorneys for Complaint Counsel

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2023, I filed the foregoing document electronically using the FTC's E-Filing system, which will send notification of such filing to:

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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 February 6, 2023, I caused the foregoing document to be served via email to:

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Dated: February 6, 2023

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Respectfully submitted,

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Christine Stoddard

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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 seek *in camera* treatment of documents it produced that may be introduced at the hearing in this matter.

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 for *in camera* treatment of documents is hereby extended until and including March 10, 2023.

ORDERED:

Hon. D. Michael Chappell
Chief Administrative Law Judge

Date: _____