

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

In the Matter of:)	
		Docket No. 9374
Louisiana Real Estate Appraisers Board,)	PUBLIC
Respondent.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME FOR REAL ESTATE VALUATION PARTNERS, LLC TO FILE A MOTION TO QUASH OR LIMIT RESPONDENT'S SUBPOENA DUCES TECUM

Pursuant to 16 C.F.R. §3.34(c), Real Estate Valuation Partners, LLC ("REVP"), through counsel, hereby moves for an extension of time to file a motion to quash or limit the subpoena *duces tecum* served on REVP by Respondent. Specifically, REVP requests that the deadline for filing such a motion be extended to August 7, 2017. In support of this motion, REVP states as follows:

1. On July 17, 2017, Respondent served a subpoena duces tecum on REVP. A copy of that subpoena is attached as Exhibit A. The subpoena includes twelve separate requests for production.

2. The subpoena purports to require REVP to produce the requested documents by August 4, 2017. See Exhibit A, page 1. Pursuant to Federal Trade Commission Rule of

Practice 3.34(c), 16 C.F.R. §3.34(c), REVP has 10 days, until Thursday, July 27, 2017, in which to file a motion to quash or limit the subpoena.

3. REVP and Respondent are planning to hold discussions regarding the scope of the document requests, any objections by REVP thereto, and the time required to REVP to search for, review, and produce responsive documents. To facilitate those discussions and to provide REVP and its counsel with adequate time to review the subpoena, REVP requests this Court extend its time for filing a motion to quash or limit the subpoena until August 7, 2017. The additional ten days will provide counsel for REVP and Respondent with additional time to attempt to resolve issues regarding the scope of the subpoena and to discuss the potential necessity of filing a motion to quash or limit.

4. The undersigned counsel represents that she has conferred with counsel for Respondent, and Respondent does not object to the proposed extension.

A proposed Order granting this motion is attached as Exhibit B.
Dated: July 27, 2017

Respectfully submitted,

Thomas P. Killam

Jennifer J. Dawson Counsel for Real Estate Valuation Partners, LLC MARSHALL & MELHORN, LLC Four SeaGate, 8th Floor Toledo, Ohio 43604 Phone: (419) 249-7100 FAX: (419) 249-7151 dawson@marshall-melhorn.com

CERTIFICATE OF SERVICE

This is to certify that on this 27th day of July, 2017, a true ad correct copy of the foregoing Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena was served by electronic means upon: W. Stephen Cannon and Kristen Broz, Constantine Cannon, 1001 Pennsylvania Avenue, Suite 1300N, Washington, DC 20004 (scannon@constantinecannon.com and <u>kbroz@constantinecannon.com</u>) and Lisa Kopchik and Sean Pugh, Federal Trade Commission, 400 7th St. SW, Washington, DC 20024 (<u>lkopchik@ftc.gov</u>).

Counsel for Real Estate Valuation Partners, LLC

I hereby certify that on July 27, 2017, I filed an electronic copy of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena Duces Tecum, with:

D. Michael Chappell Chief Administrative Law Judge 600 Pennsylvania Ave., NW Suite 110 Washington, DC, 20580

Donald Clark 600 Pennsylvania Ave., NW Suite 172 Washington, DC, 20580

I hereby certify that on July 27, 2017, I served via E-Service an electronic copy of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena Duces Tecum, upon:

Lisa Kopchik Attorney Federal Trade Commission LKopchik@ftc.gov Complaint

Michael Turner Attorney Federal Trade Commission mturner@ftc.gov Complaint

Christine Kennedy Attorney Federal Trade Commission ckennedy@ftc.gov Complaint

Geoffrey Green Attorney U.S. Federal Trade Commission ggreen@ftc.gov Complaint

W. Stephen Cannon Chairman/Partner Constantine Cannon LLP scannon@constantinecannon.com Respondent

Seth D. Greenstein Partner Constantine Cannon LLP sgreenstein@constantinecannon.com Respondent

Richard O. Levine Of Counsel Constantine Cannon LLP rlevine@constantinecannon.com Respondent

Kristen Ward Broz Associate Constantine Cannon LLP kbroz@constantinecannon.com Respondent

Thomas Brock Attorney Federal Trade Commission TBrock@ftc.gov Complaint

I hereby certify that on July 27, 2017, I served via other means, as provided in 4.4(b) of the foregoing Unopposed Motion for Extension of Time for Real Estate Valuation Partners, LLC to File a Motion to Quash or Limit Respondent's Subpoena Duces Tecum, upon:

Sean Pugh Attorney U.S. Federal Trade Commission spugh@ftc.gov Complaint

James J. Kovacs Associate Constantine Cannon LLP jkovacs@constantinecannon.com Respondent

> Jennifer Dawson Attorney