

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

In the Matter of	)	
	)	
IQVIA Holdings Inc.,	)	
a corporation,	)	<b>DOCKET NO. 9416</b>
	)	
and	)	<b>PUBLIC VERSION</b>
	)	
Propel Media, Inc.,	)	
a corporation.	)	

**UNOPPOSED MOTION TO EXTEND SCHEDULING DEADLINES  
UNTIL JANUARY 9, 2024**

Respondents IQVIA Holdings Inc. and Propel Media, Inc. jointly move to extend all scheduling deadlines in this proceeding until January 9, 2024, in light of the preliminary injunction recently entered in federal district court. Complaint Counsel does not oppose this motion.

On July 17, 2023, the FTC filed a Complaint for a Temporary Restraining Order and Preliminary Injunction in the United States District Court for the Southern District of New York pursuant to Section 13(b) of the Federal Trade Commission Act. *See FTC v. IQVIA Holdings Inc.*, No. 1:23-cv-06188-ER, ECF No. 1 (S.D.N.Y. 2023). The district court held an evidentiary hearing on the FTC’s preliminary injunction request from November 20 to December 1, 2023. On December 29, 2023, the district court granted the preliminary injunction. *See id.*, ECF No. 324. The Parties have filed a joint motion to withdraw based on [REDACTED]

[REDACTED]

[REDACTED]

Extending the scheduling deadline for a brief period of time will preserve the resources of the parties, nonparties, and this Court, by avoiding possibly unnecessary waste associated with

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imminent pretrial deadlines should the matter ultimately be withdrawn from adjudication or be dismissed prior to the evidentiary hearing. The parties and nonparties have several imminent deadlines starting today. Since Respondents do not propose to alter deadlines after January 16, 2024, this brief delay would not otherwise disrupt the schedule of the administrative proceedings.

Accordingly, Respondents respectfully propose that all deadlines be extended until January 9, 2024. Deadlines after January 12, 2024 would remain unchanged as reflected in the proposed amended scheduling order, attached as Exhibit A. All other provisions of this Court's scheduling orders would remain in place, except for the dates identified in Exhibit A.

Dated: January 3, 2024

Respectfully submitted,

/s/ Chantale Fiebig

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<b>IQVIA Holdings Inc.,</b>	)	
<b>a corporation,</b>	)	<b>DOCKET NO. 9416</b>
	)	
<b>and</b>	)	<b>PUBLIC VERSION</b>
	)	
<b>Propel Media, Inc.,</b>	)	
<b>a corporation.</b>	)	
_____	)	

**[Proposed] Order Extending Scheduling Deadlines**

Having considered the motion to extend all deadlines until January 9, 2024, the motion is hereby GRANTED.

ORDERED:

\_\_\_\_\_

D. Michael Chappell  
Chief Administrative Law Judge

Date: January \_\_\_\_, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that, on January 3, 2024, I caused the foregoing document to be electronically filed with the Secretary of the Commission using the Federal Trade Commission's e-filing system, causing the document to be served on all of the following registered participants:

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The Honorable D. Michael Chappell  
Administrative Law Judge  
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I also certify that I caused the foregoing document to be served via email to:

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***Counsel for Respondent Propel Media, Inc.***

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**CERTIFICATE FOR ELECTRONIC FILING**

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the original filing, and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

*/s/ Chantale Fiebig*

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Chantale Fiebig

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**EXHIBIT A**  
**([PROPOSED] AMENDED SCHEDULING**  
**ORDER)**



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FEDERAL TRADE COMMISSION  
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a corporation, and	)	
	)	Docket No. 9416
Propel Media, Inc.,	)	
a corporation,	)	
	)	
Respondents.	)	

**PROPOSED  
SCHEDULING ORDER**

- |                 |   |  |
|-----------------|---|--|
| January 9, 2024 | - | Parties exchange final proposed witness and exhibit lists. The parties provide courtesy copies to the ALJ of their final proposed witness and exhibit lists, the basis of admissibility for each proposed exhibit, and a brief summary of the testimony of each witness, including expert witnesses. |
|-----------------|---|--|
- |                 |   |   |
|-----------------|---|---|
| January 9, 2024 | - | Complaint Counsel to identify rebuttal expert(s) and provide rebuttal expert report(s). |
|-----------------|---|---|
- |                 |   |  |
|-----------------|---|--|
| January 9, 2024 | - | Exchange and serve courtesy copy on ALJ of objections to final proposed witness lists and exhibit lists. |
|-----------------|---|--|
- |                 |   |   |
|-----------------|---|---|
| January 9, 2024 | - | Deadline for depositions of experts (including rebuttal experts) and exchange of expert related exhibits. |
|-----------------|---|---|
- |                  |   |  |
|------------------|---|--|
| January 12, 2024 | - | Complaint Counsel files pretrial brief supported by legal authority. |
|------------------|---|--|
- |                  |   |   |
|------------------|---|---|
| January 12, 2024 | - | Deadline for filing motions <i>in limine</i> to preclude admission of evidence. |
|------------------|---|---|
- |                  |   |  |
|------------------|---|--|
| January 12, 2024 | - | Deadline for filing motions for <i>in camera</i> treatment of proposed trial exhibits. |
|------------------|---|--|

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- January 16, 2024 - Deadline for filing responses to motions *in limine* to preclude admission of evidence.
- January 16, 2024 - Deadline for filing responses to motions for *in camera* treatment of proposed trial exhibits.
- January 16, 2024 - Exchange proposed stipulations of law, facts, and authenticity.
- January 16, 2024 - Respondents' Counsel files pretrial brief supported by legal authority.
- January 17, 2024 - Final prehearing conference to begin at 1:00 p.m. ET.
- January 18, 2024 - Commencement of hearing and trial on the merits to begin at 10:00 a.m. ET.