## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSIO OFFICE OF ADMINISTRATIVE LAW JUDGES

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SECRETARY

In the Matter of

Jerk, LLC, a limited liability company,
also d/b/a/ JERK.COM, and

John Fanning, individually and as a member of
Jerk, LLC,

Respondents.

DOCKET NO. 9361

## RESPONDENT JERK, LLC'S MOTION FOR LEAVE TO FILE OPPOSITION TO COMPLAINT COUNSEL'S MOTION FOR SANCTIONS LATE

Respondent Jerk, LLC ("Jerk") hereby moves for leave to file its Opposition to Complaint Counsel's Motion for Sanctions late. As reasons therefor, Jerk states the following:

- When Complaint Counsel filed its Motion for Sanctions Against Jerk, LLC on February 5, 2015, Jerk was not represented by counsel. Jerk remained without counsel until February 18, 2015.
- Allowing Jerk, LLC to file its Opposition should not create any delay in these
  proceedings, nor will it otherwise prejudice Complaint Counsel. Respondent John
  Fanning filed an Objection to Complaint Counsel's Motion on February 11, 2015, well

before the deadline for doing so. Jerk's Opposition joins in Respondent Fanning's

Objection and makes no legal arguments that are not contained in therein.

Respectfully Submitted,

JERK, LLC,

By its Attorney,

/s/ Alexandria B. Lynn

Alexandria B. Lynn 48 Dartmouth Street Watertown, MA 02472 (617) 631-8781

Dated: February 25, 2015

## Notice of Electronic Service for Public Filings

I hereby certify that on February 25, 2015, I filed via hand a paper original and electronic copy of the foregoing Declaration of Alexandria B. Lynn, Jerk's Opposition to Motion for Sanctions, Attachment A to Declaration of Alexandria B. Lynn, Attachment B to Declaration of Alexandria B. Lynn, Motion for Leave to File Opposition to Motion for Sanctions Late, 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 February 25, 2015, I filed via E-Service of the foregoing Declaration of Alexandria B. Lynn, Jerk's Opposition to Motion for Sanctions, Attachment A to Declaration of Alexandria B. Lynn, Attachment B to Declaration of Alexandria B. Lynn, Motion for Leave to File Opposition to Motion for Sanctions Late, with:

Sarah Schroeder Attorney Federal Trade Commission sschroeder@ftc.gov Complaint

Yan Fang Attorney Federal Trade Commission yfang@ftc.gov Complaint

Kerry O'Brien Attorney Federal Trade Commission kobrien@ftc.gov Complaint

Maria Speth Attorney Jaburg & Wilk, P.C. mcs@jaburgwilk.com Respondent

Boris Yankilovich Attorney Federal Trade Commission byankilovich@ftc.gov Complaint

Kenneth H. Abbe Attorney Federal Trade Commission kabbe@ftc.gov Complaint I hereby certify that on February 25, 2015, I filed via other means, as provided in 4.4(b) of the foregoing Declaration of Alexandria B. Lynn, Jerk's Opposition to Motion for Sanctions, Attachment A to Declaration of Alexandria B. Lynn, Attachment B to Declaration of Alexandria B. Lynn, Motion for Leave to File Opposition to Motion for Sanctions Late, with:

Peter F. Carr, II Attorney Eckert Seamans Cherin & Mellott, LLC pcarr@eckertseamans.com Respondent

> Alexandria Lynn Attorney