

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Rebecca Kelly Slaughter, Acting Chair
Noah Joshua Phillips
Rohit Chopra
Christine S. Wilson

In the Matter of

HEALTH RESEARCH LABORATORIES, LLC,
a limited liability company,

WHOLE BODY SUPPLEMENTS, LLC,
a limited liability company, and

KRAMER DUHON,
individually and as an officer of HEALTH
RESEARCH LABORATORIES, LLC and
WHOLE BODY SUPPLEMENTS, LLC

DOCKET NO. 9397

RESPONDENTS' RESPONSE TO MOTION TO EXTEND DATE FOR COMPLAINT
COUNSEL'S REPLY TO RESPONDENTS' RESPONSE TO COMPLAINT COUNSEL'S
STATEMENT OF ADDITIONAL MATERIAL FACTS AND OPPOSITION TO
RESPONDENTS' MOTION TO STRIKE

Respondents do not oppose the relief requested in the Motion to Extend, i.e., (a) the extension of the deadline for Complaint Counsel to respond to June 21, 2021; and (b) the denial of Respondents' motion to strike Complaint Counsel's Statement of Additional Material Facts as untimely. However, certain additional statements included in Complaint Counsel's Proposed Order are inaccurate and improper.

Respondents did not (a) "deviate[] from the issues set forth in the Order" or (b) clarify that they "will not ... accept or agree to the legality of any of the relief in the Notice

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of Contemplated Relief.” *See* Proposed Order. In their Response, Respondents provided the specific reasons why they disputed the additional facts and why they contested the proposed relief in the Notice of Contemplated Relief. Including Complaint Counsel’s statements in the Order would prejudice Respondents’ Response based on arguments from Complaint Counsel. These statements should not be included in the Order.

Dated: June 7, 2021

Respectfully submitted,

REESE MARKETOS LLP

By: */s/ Joel W. Reese* _____

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ATTORNEYS FOR RESPONDENTS

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CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2021, I filed the foregoing document electronically using the FTC's E-Filing system, which will send notification to:

April J. Tabor
Acting Secretary
Federal Trade Commission
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The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
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/s/ Joel W. Reese

Joel W. Reese