

GREGORY J. MADDEN (MD Bar)
SUSAN H. POPE (D.C. Bar No. 470345)
HONG PARK (D.C. Bar No. 475930)
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Mail Drop CC-9528
Washington, D.C. 20580
Tel: (202) 326-2426, -3302, -2158
Fax: (202) 326-3197
Email: gmadden@ftc.gov, spope@ftc.gov,
hpark@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,

Plaintiff,

v.

LifeLock, Inc. *et al.*,

Defendants.

No. CV-10-00530-PHX-MHM

**PLAINTIFF FEDERAL TRADE
COMMISSION'S NOTICE OF
LODGING PROPOSED DOCUMENTS
UNDER SEAL**

Plaintiff Federal Trade Commission, by and through undersigned counsel, in support of its allegations that from at least October 2012 through March 2014, Lifelock violated the 2010 Order by: 1) failing to establish and maintain a comprehensive information security program to protect its users' sensitive personal

data, including credit card, social security, and bank account numbers; 2) falsely advertising that it protected consumers' sensitive data with the same high-level safeguards as financial institutions; 3) failing to meet the 2010 order's recordkeeping requirements; and 4) from at least January 2012 through December 2014, falsely claiming it protected consumers' identity 24/7/365 by providing alerts "as soon as" it received any indication there was a problem, hereby gives notice to all interested parties that it has lodged under seal with the Court this same date the following:

- (1) Memorandum in Support of Its Notice Of Lodging Proposed Documents Under Seal;
- (2) Certification of Plaintiff Federal Trade Commission Regarding Conference Requirements under Civil Local Rule 5.6;
- (3) Motion for Leave to File Memorandum in Support of Its Motion for Contempt Against LifeLock, Inc. in Excess of the Page Limit;
- (4) Motion for Contempt Against LifeLock, Inc.;
- (5) Memorandum in Support of Its Motion for Contempt Against LifeLock, Inc.;
- (6) FTC Lodged Proposed Exhibits 1 through 73; and
- (7) Motion for Leave to Allow the Non-Electronic Filing of Exhibits in Connection with Plaintiff's Motion for Contempt Against LifeLock, Inc. and Memorandum in Support Thereof.

Respectfully submitted,

Dated: July 21, 2015

s/ Gregory J. Madden
GREGORY J. MADDEN
SUSAN H. POPE
HONG PARK
Federal Trade Commission
Division of Enforcement
Mailcode: CC-9528
600 Pennsylvania Ave., NW
Washington, DC 20580
(202) 326-2426, gmadden@ftc.gov
(202) 326-3302, spope@ftc.gov
(202) 326-2158, hpark@ftc.gov
(202) 326-3197 (facsimile)

Attorneys for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I certify that I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to the following CM/ECF registrants, and served a copy of same to the following if non-registrants, this 21st day of July, 2015.

Andrew G. Berg, Counsel to LifeLock, Inc. (via CM/ECF)
Greenberg Traurig, LLP
2101 L Street NW, Suite 1000
Washington, DC 20037
berga@gtlaw.com

Bilal Sayyed, Counsel to LifeLock, Inc. (courtesy copy via email)
Kirkland & Ellis LLP
655 15th Street, NW
Washington, D.C., 20005

bilal.sayyed@kirkland.com

Date: July 21, 2015

By: s/ Gregory J. Madden
GREGORY J. MADDEN