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

ADMINISTRATIVE LAW JUDGE: JAY L. HIMES

IN THE MATTER OF: NATALIA LYNCH, APPELLANT

DOCKET No. D09423

#### **JOINT STIPULATION**

Pursuant to Judge Himes's June 26, 2024 Order, Appellant Natalia Lynch ("Ms. Lynch") and Respondent Horseracing Integrity and Safety Authority ("HISA") (collectively, "the Parties") stipulate to the following facts for the forthcoming evidentiary hearing on July 16, 2024.

- 1) The results of all of the testing reflected in Ms. Lynch's supplemental exhibit 10 for all horses other than MOTION TO STRIKE were negative.
- 2) Ms. Lynch's HIWU File No. is: HI-23-063
- 3) Mr. Tessore's HIWU File No is: HI-23-074
- 4) Each of the experts each side has offered are experts in their respective fields.

  HISA enters into this stipulation without prejudice to its position on the admissibility of Appellant's Supplemental Exhibit 11 and testimony from that expert in support thereof.

Dated: July 12, 2024 Respectfully submitted,

# /s/ Grant S. May

H. CHRISTOPHER BOEHNING GRANT S. MAY PAUL, WEISS, RIFKIND WHARTON & GARRISON LLP 1285 Avenue of the Americas New York, NY 10019 (212) 373-3061 cboehning@paulweiss.com

Counsel for Appellant Ms. Lynch

### /s/ Lee Popkin

LEE POPKIN PROSKAUER ROSE LLP Eleven Times Square New York, NY 10036 lpopkin@proskauer.com

Counsel for HISA

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 12, 2024, pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), I caused the foregoing to be filed and served as follows:

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW
Suite CC-5610
Washington, DC 20580
(by e-mail to electronicfilings@ftc.gov)

Hon. Jay L. Himes

Administrative Law Judge

Office of Administrative Law Judges

Federal Trade Commission

600 Pennsylvania Avenue, NW

Washington, DC 20580

(by e-mail to oalj@ftc.gov)

Horseracing Integrity and Safety Authority (HISA)
Lisa Lazarus and Samuel Reinhardt
401 W. Main Street, Suite 222
Lexington, KY 40507
(by e-mail to lisa.lazarus@hisaus.org and samuel.reinhardt@hisaus.org)

Horseracing Integrity & Welfare Unit (HIWU)

Michelle C. Pujals and Allison J. Farrell

4801 Main Street, Suite 350

Kansas City, MO 64112

(by e-mail to <a href="mpujals@hiwu.org">mpujals@hiwu.org</a> and <a href="mpujals@hiwu.org">afarrell@hiwu.org</a>)

James Bunting

Tyr LLP

488 Wellington St. W, Suite 300-302

Toronto, Ontario, Canada

M5V 1E3

(by email to <a href="mailto:jbunting@tyrllp.com">jbunting@tyrllp.com</a>)