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

ADMINISTRATIVE LAW JUDGE: Jay L. Himes

IN THE MATTER OF: DOCKET No. D09423

NATALIA LYNCH, APPELLANT

# PARTIES' JOINT STATEMENT REGARDING CLOSING ARGUMENTS

Closing arguments have been requested in this matter under the provisions of 16 C.F.R. § 1.146(c)(4)(iii). Pursuant to Judge Himes's July 17, 2024 Order, Appellant Natalia Lynch ("Ms. Lynch") and Respondent Horseracing Integrity and Safety Authority ("HISA") (collectively, "the Parties") have met and conferred regarding their availability. The Parties have identified the following dates on which they are both available for Closing Arguments, subject to the Court's availability and convenience:

- 1) August 30, 2024 (any time during the day);
- 2) September 4, 2024 (from 10:30 AM on).

The Parties do not have a preference between these two dates. The Parties are available for a teleconference with the Court to discuss scheduling further.

Dated: August 26, 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 Respondent HISA

#### **CERTIFICATE OF SERVICE**

The Parties hereby certify that on August 26, 2024, pursuant to Federal Trade

Commission Rules of Practice 4.2(c) and 4.4(b), they 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 email 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 email 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 email 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 email to mpujals@hiwu.org and afarrell@hiwu.org)

Bryan H. Beauman and Rebecca C. Price Sturgill, Turner, Barker & Moloney, PLLC 333 W. Vine Street, Suite 1500 Lexington, KY 40507 (by email to bbeauman@sturgillturner.com and rprice@sturgillturner.com)

Paul J. Greene Global Sports Advocates 254 Commercial Street Suite 245 Portland, ME 04101 (by email to pgreene@globalsportsadvocates.com) James Bunting
Tyr LLP
488 Wellington St. W, Suite 300-302
Toronto, Ontario, Canada M5V 1E3
(by email to jbunting@tyrllp.com)