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

**In the Matter of**

**Tapestry, Inc.,  
a corporation,**

**and**

**Capri Holdings Limited,  
a corporation.**

**PUBLIC**

**DOCKET NO. 9429**

**NON-PARTY CULT GAIA LLC'S MOTION FOR *IN CAMERA* TREATMENT**

Pursuant to Rule 3.45 of the Federal Trade Commission's Rules of Practice, 16 C.F.R. § 3.45(b), non-party Cult Gaia LLC ("Cult Gaia") respectfully moves this court for *in camera* treatment of competitively sensitive, confidential business documents (the "Confidential Documents"). Cult Gaia produced these documents in response to a third-party document and deposition subpoena in the Southern District of New York matter. The Confidential Documents have all been designated as "Confidential" under the April 25, 2024, Protective Order Governing Confidential Material (the "Protective Order") entered by this Court. The Federal Trade Commission ("FTC") and Tapestry Inc. ("Tapestry") have now notified Cult Gaia that they intend to introduce thirteen Cult Gaia documents, including the Confidential Documents, into evidence at the administrative trial in this matter. *See* Letter from Federal Trade Commission dated August 29, 2024 (attached as Exhibit A); *see also* Email from Tapestry's counsel dated August 30, 2024 (attached as Exhibit B). Both counsel for the FTC and Tapestry have indicated they will not oppose Cult Gaia's motion.

**INTRODUCTION**

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Cult Gaia is a global company that sells ready to wear bags, shoes and accessories, and has sold handbags in the United States since 2013. Cult Gaia received two document subpoenas by the FTC and Tapestry in connection with this case, as well as deposition subpoenas. Cult Gaia produced the documents requested, including confidential business documents, and the Chief Executive Officer, Jasmin Larian, sat for a deposition as the corporate designee for Cult Gaia. Cult Gaia has consistently requested confidentiality where appropriate under the Protective Order. All of the Confidential Documents have properly been designated as “CONFIDENTIAL MATERIAL.” The FTC and Tapestry have indicated they intend to produce thirteen Cult Gaia documents into evidence as part of the administrative hearing, twelve of which are part of the Confidential Documents. *See* Exhibits A and B.

The Confidential Documents warrant additional protection from public disclosure given the sensitive business information they contain. Thus, Cult Gaia submits this motion for *in camera* treatment of the Confidential Documents in their entirety. All of the documents for which Cult Gaia is seeking *in camera* treatment are confidential business documents, such that if they were to become part of the public record, Cult Gaia would be significantly harmed in its ability to compete in the clothing, accessories and shoes retail industry. For the reasons discussed in this motion, Cult Gaia requests that this Court afford its confidential business documents *in camera* treatment for at least five years. In support of this Motion, Cult Gaia incorporates the Declaration of Cult Gaia’s Chief Executive Officer, Jasmin Larian (“Decl.”), attached as Exhibit C, which provides additional details on the documents for which Cult Gaia is seeking *in camera* treatment.

**I. The Documents for Which Protection is Sought**

Cult Gaia seeks *in camera* treatment for the following Confidential Documents, copies of which are attached as Exhibits D, E, F and G.

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Ex No.	Description	Date	Bates-Begin	Bates-End
PX3002	Cult Gaia Document: Wholesale Handbags Selling Jan2024-May2024		CG00001	CG00007
PX3003	Cult Gaia Document: Wholesale Handbags Selling Jan2023-Dec2023		CG00008	CG00026
PX3004	Cult Gaia Document: Wholesale Handbags Selling Jan2022-Dec2022		CG00027	CG00039
PX3005	Cult Gaia Document: Wholesale Handbags Selling Jan2021-Dec2021		CG00040	CG00056
PX3006	Cult Gaia Document: Handbags selling Jan2024-May2024		CG00057	CG00072
PX3007	Document: Cult Gaia Handbags Selling Jan2023-Dec2023		CG00073	CG00102
PX3008	Document: Cult Gaia Handbags Selling Jan2022-Dec2022		CG00103	CG00117
PX3009	Document: Cult Gaia Handbags Selling Jan2021-Dec2021		CG00118	CG00127
PX3014	Document: Cult Gaia Letter Cult Gaia LLC	7/8/2024	CG00291	CG00292
PX5050	Deposition Transcript of Jasmin Larian (Cult Gaia)	7/18/2024	PX5050-001	PX5050-039
DX0650	Cult Gaia's internal cost sheet		CG00293	CG00293
DX0931	Deposition transcript of Jasmin Larian (Cult Gaia)	7/18/2024		

## II. Legal Standard

Under Rule 3.45(b), the Administrative Law Judge may order that material offered into evidence “be placed in camera only ... after finding that its public disclosure will likely result in a clearly defined, serious injury to the person, partnership or corporation requesting in camera treatment.” 16 C.F.R. § 3.45(b). “[R]equests for in camera treatment must show ‘that the public disclosure of the documentary evidence will result in a clearly defined, serious injury to the person or corporation whose records are involved.’” *In re Kaiser Aluminum & Chem. Corp.*, 1984 FTC LEXIS 60, at \*1 n.1 (May 25, 1984), quoting *In re H. P. Hood & Sons, Inc.*, 1961 FTC LEXIS 368 (Mar. 14, 1961). Applicants must “make a clear showing that the information concerned is

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sufficiently secret and sufficiently material to their business that disclosure would result in serious competitive injury.” *In re General Foods Corp.*, 1980 FTC LEXIS 99, at \*10 (Mar. 10, 1980). “The likely loss of business advantages is a good example of a ‘clearly defined, serious injury.’” *In re Hoechst Marion Roussel, Inc.*, 2000 FTC LEXIS 138, at \*6 (Sept. 19, 2000) (citation omitted). In order to sustain the burden for withholding documents from the public record, an affidavit or declaration is always required, demonstrating that a document is sufficiently secret and sufficiently material to the applicant’s business that disclosure would result in serious competitive injury. *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 109, at \*3-4 (Apr. 23, 2004).

Further, ordinary business records include information such as customer names, pricing to customers, business costs and profits, as well as business plans, marketing plans, or sales documents. See *In re McWane, Inc.*, 2012 FTC LEXIS 143 (Aug. 17, 2012); *In re Int’l Ass’n of Conference Interpreters*, 1996 FTC LEXIS 298, at \*13-14. The Court considers six factors in making its determination:

- (1) the extent to which the information is known outside of [the applicant’s] business;
- (2) the extent to which it is known by employees and others involved in [the] business;
- (3) the extent of measures taken by [the applicant] to guard the secrecy of the information;
- (4) the value of the information to [the applicant] and to [its] competitors;
- (5) the amount of effort or money expended by [the applicant] in developing the information;
- (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

*In re Bristol-Myers Co.*, 1977 FTC LEXIS 25, at \*5.

### **III. Cult Gaia Confidential Documents are Secret and Material such that Disclosure Would Result in Serious Injury to Cult Gaia**

Cult Gaia’s Confidential Documents should be afforded *in camera* treatment because they contain highly sensitive business information, which would seriously injure Cult Gaia if they were

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to become publicly known. Indeed, public disclosure of the Confidential Documents will result in serious injury to Cult Gaia because these materials contain highly sensitive information covering

[REDACTED] Decl. ¶¶ 3, 5, 6, 8. In addition, the deposition testimony of Jasmin Larian, deposed in her capacity as Cult Gaia's corporate designee pursuant to Federal Rule of Civil Procedure 30(b)(6), also contains confidential testimony related to [REDACTED]

[REDACTED] that are not publicly available or known. Decl. ¶7. Confidential treatment of Cult Gaia's testimony was requested pursuant to the Stipulated Protective Order. If this information were to become public or known by Cult Gaia's competitors, it would irreparably injure Cult Gaia and gravely impact its ability to compete in the handbags retail industry. Decl. ¶9. As a result, the Southern District of New York granted Cult Gaia's letter-motion to seal the entire deposition transcript, as well as DX0650. Ex. F and G.

Further, if these documents were to become public, Cult Gaia might lose a significant competitive and business advantage. *See In Re Dura Lube Corp.*, 1999 FTC LEXIS, 255 at \*7 (Dec. 23, 1999) ("The likely loss of business advantages is a good example of 'clearly defined, serious injury.'"). The Confidential Documents contain sensitive business information which Cult Gaia has compiled and uses to determine its business strategy. Cult Gaia produced these documents under compulsory process and did so in a confidential manner and invoked the Protective Order's confidentiality protection as a result. Similarly, the testimony provided by Ms. Larian contains highly sensitive business information covering Cult Gaia's business strategy, and would cause serious competitive harm to Cult Gaia if publicly disclosed. Ms. Larian complied with the deposition subpoenas in a compulsory process, and provided the testimony believing it would remain confidential.

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Finally, Cult Gaia’s status as a third party is relevant to the treatment of its documents. The FTC has held that third-parties deserve “special solicitude” in their request for *in camera* treatment for its confidential business information. *See In Re Kaiser Aluminum & Chem. Corp.*, 103 FTC 500, 500 (1984) (“As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests”). Cult Gaia’s third-party status thus weighs in favor of granting *in camera* treatment to the Confidential Documents.

Accordingly, Cult Gaia respectfully requests that this Court grant *in camera* treatment for at least five years for the Confidential Documents in their entirety.

**RELIEF REQUESTED**

Cult Gaia respectfully requests that the Confidential Documents be granted *in camera* treatment for at least five years.

Dated: September 10, 2024

Respectfully submitted,

By: *s/ Olivera Medenica*

Olivera Medenica

Dunnington, Bartholow & Miller LLP

230 Park Avenue, 21<sup>st</sup> Floor

New York, 10169 NY

Telephone: (212) 682-8811

Email: omedenica@dunnington.com

*Counsel for Third-Party Cult Gaia LLC*

**PUBLIC****STATEMENT REGARDING MEET AND CONFER**

The undersigned certifies that counsel for the Federal Trade Commission and Tapestry Inc. notified counsel for Cult Gaia LLC (“Cult Gaia”) on August 29, 2024, and August 30, 2024, respectively, that they would include certain documents marked as CONFIDENTIAL MATERIAL in their evidence. Both counsel notified counsel for Cult Gaia that they would not object Cult Gaia’s motion for *in camera* treatment in their evidentiary notices.

Dated: September 10, 2024

*s/ Olivera Medenica*

Olivera Medenica  
Dunnington, Bartholow & Miller LLP  
230 Park Avenue, 21<sup>st</sup> Floor  
New York, 10169 NY  
(212) 682-8811  
omedenica@dunnington.com

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## CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2024, I filed the foregoing document electronically using the FTC's E-Filing System, which will send notification of such filing to:

April Tabor  
Secretary  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-113  
Washington, DC 20580  
[ElectronicFilings@ftc.gov](mailto:ElectronicFilings@ftc.gov)

The Honorable Dania L. Ayoubi  
Office of Administrative Law Judges  
Federal Trade Commission  
600 Pennsylvania Ave., NW, Rm. H-110  
Washington, DC 20580  
[oyalj@ftc.gov](mailto:oyalj@ftc.gov)

I also certify that I caused the foregoing document to be served via email to:

Peter Colwell  
Federal Trade Commission,  
Bureau of Competition  
600 Pennsylvania Ave.,  
NW Washington, D.C. 20580  
Tel.: 202.677.9486  
[pcolwell@ftc.gov](mailto:pcolwell@ftc.gov)  
*Complaint Counsel*

Kimon Kimball Triantafyllou  
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555 Eleventh Street, NW,  
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*Counsel for Tapestry, Inc.*

Beatrice R. Pollard Wachtell,  
Lipton, Rosen & Katz  
51 West 52<sup>nd</sup> Street  
New York, NY 10019  
Tel.: 212.403.1654  
[BRPollard@wlrk.com](mailto:BRPollard@wlrk.com)  
*Counsel for Capri Holdings Limited*

By: s/ Olivera Medenica  
Olivera Medenica

*Counsel for Third-Party Cult Gaia LLC*



# **EXHIBIT A**



UNITED STATES OF AMERICA  
 FEDERAL TRADE COMMISSION  
 WASHINGTON, D.C. 20580

Bureau of Competition  
 Mergers II Division

August 29, 2024

**VIA EMAIL TRANSMISSION**

Cult Gaia, LLC C/O  
 Olivera Medenica  
 Dunnington Bartholow & Miller LLP  
 230 Park Avenue, 21st Floor  
 New York, NY 10169  
 omedenica@dunnington.com

RE: *In the Matter of Tapestry, Inc. and Capri Holdings Limited*, Docket No. 9429

Dear Olivera Medenica:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intends to offer the documents and testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. Please let me know if you need copies of the documents and testimony referenced in Attachment A.

The administrative trial is scheduled to begin on September 25, 2024. All exhibits admitted into evidence become part of the public record unless Administrative Law Judge Dania L. Ayoubi grants *in camera* status (i.e., non-public/confidential).

For documents or testimony that include sensitive or confidential information that you do not want on the public record, you must file a motion seeking *in camera* status or other confidentiality protections pursuant to 16 C.F.R. §§ 3.45 and 4.10(g). Judge Ayoubi may order materials, whether admitted or rejected as evidence, be placed *in camera* only after finding that their public disclosure will likely result in a clearly-defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment.

Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS 39 (Feb. 23, 2015); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the material. *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (Apr. 23, 2004). For your convenience, we included, as links in the cover email, an example of a third-party motion (and the accompanying declaration or affidavit) for *in camera* treatment that was filed and granted in an FTC administrative proceeding. If you choose to move for *in camera* treatment, you must provide a copy of the document(s) for which you seek such treatment to the Administrative Law Judge. Also, you or

your representative will need to file a Notice of Appearance in the administrative proceeding. For more information regarding filing documents in adjudicative proceedings, please see <https://www.ftc.gov/about-ftc/bureaus-offices/office-secretary/document-filing>.

Please be aware that under the current Scheduling Order **the deadline for filing motions seeking *in camera* treatment is September 10, 2024**. A copy of the May 16, 2024 Scheduling Order can be found at [Tapestry/Capri](#). If you have any questions, please feel free to contact me at (202) 326-3672 or [nlindquist@ftc.gov](mailto:nlindquist@ftc.gov).

Sincerely,

/s/ Nicole Lindquist

Nicole Lindquist

Counsel Supporting the Complaint

Attachment

**ATTACHMENT A**  
**CONFIDENTIALITY NOTICE**

<b>Ex No.</b>	<b>Description</b>	<b>Date</b>	<b>Bates-Begin</b>	<b>Bates-End</b>
PX3002	Cult Gaia Document: Wholesale Handbags Selling Jan2024-May2024		CG00001	CG00007
PX3003	Cult Gaia Document: Wholesale Handbags Selling Jan2023-Dec2023		CG00008	CG00026
PX3004	Cult Gaia Document: Wholesale Handbags Selling Jan2022-Dec2022		CG00027	CG00039
PX3005	Cult Gaia Document: Wholesale Handbags Selling Jan2021-Dec2021		CG00040	CG00056
PX3006	Cult Gaia Document: Handbags selling Jan2024-May2024		CG00057	CG00072
PX3007	Document: Cult Gaia Handbags Selling Jan2023-Dec2023		CG00073	CG00102
PX3008	Document: Cult Gaia Handbags Selling Jan2022-Dec2022		CG00103	CG00117
PX3009	Document: Cult Gaia Handbags Selling Jan2021-Dec2021		CG00118	CG00127
PX3014	Document: Cult Gaia Letter Cult Gaia LLC - 07-08-24	7/8/2024	CG00291	CG00292
PX5050	Deposition Transcript of Jasmin Larian (Cult Gaia)(July 18, 2024)	7/18/2024	PX5050-001	PX5050-039

**EXHIBIT B**

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**From:** [Emily.Viola@lw.com](mailto:Emily.Viola@lw.com)  
**To:** [Maaïke Angulo](#); [Olivera Medenica](#); [Jemima Hague](#)  
**Cc:** [Jennifer.Giordano@lw.com](mailto:Jennifer.Giordano@lw.com); [Daniel.Reid@lw.com](mailto:Daniel.Reid@lw.com)  
**Subject:** In the Matter of Tapestry Inc., and Capri Holdings Ltd., Dkt No. 9439 (Cult Gaia)  
**Date:** Friday, August 30, 2024 5:12:44 PM  
**Attachments:** [2024.04.25 - Protective Order Governing Confidential Material.pdf](#)  
[2024.05.16 - Scheduling Order.pdf](#)

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Counsel,

Pursuant to the Scheduling Order and Protective Order *In the Matter of Tapestry Inc., and Capri Holdings Ltd.*, Dkt No. 9439 (attached for reference) and 16 C.F.R. § 3.45(b), we are providing notice that we intend to offer materials or testimony provided by Cult Gaia (the “third party”) as evidence at the FTC’s Part 3 administrative evidentiary hearing beginning on September 25, 2024 in Washington, DC. Accordingly, pursuant to the Scheduling Order in this matter, if a third party wishes *in camera* treatment for a document or transcript that a party intends to introduce into evidence, that third party shall file an appropriate motion with the Administrative Law Judge within ten (10) days after it receives notice of a party’s intent to introduce such material. Respondents will not oppose any proposed *in camera* treatment. The materials and/or testimony included are:

- DX-0650 - CG00293
- DX-0670 - CG00155
- DX-0931 - Deposition transcript of Jasmin Larian (Cult Gaia)

We are also filing in *FTC v. Tapestry, Inc.*, No. 24-cv-3109 (S.D.N.Y.) proposed findings of fact and conclusions of law that contain some of the Confidential Material of Cult Gaia that we have previously identified to you and filed under seal in the federal proceeding. The materials and/or testimony included are:

- DX-0931 - Deposition transcript of Jasmin Larian (Cult Gaia)

We plan on filing any Confidential Material under seal and believe that, under the protective order, any third-party Confidential Material may be filed under seal without a motion and no further motion or letter is required of third-parties, unless ordered by the Court. See P.O. Para. 9, ECF No. 70.

Best,

**Emily J. Viola**  
Pronouns: *she/her/hers*

**LATHAM & WATKINS LLP**  
1271 Avenue of the Americas  
New York, NY 10020  
Direct Dial: +1.332.240.1478  
Email: [emily.viola@lw.com](mailto:emily.viola@lw.com)  
<https://www.lw.com>

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

**In the Matter of**

**Tapestry, Inc.,  
a corporation,**

**and**

**Capri Holdings Limited,  
a corporation.**

**DOCKET NO. 9429**

**DECLARATION OF JASMIN LARIAN IN SUPPORT OF NON-PARTY CULT GAIA  
LLC'S MOTION FOR IN CAMERA TREATMENT**

I, Jasmin Larian, hereby declare as follows:

1. I am the Chief Executive Officer of Cult Gaia LLC ("Cult Gaia"). I make this declaration in support of Non-Party Cult Gaia's Motion for *In Camera* Treatment (the "Motion"). I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

2. I have reviewed and am familiar with the documents Cult Gaia produced in the above-captioned matter in response to subpoenas from the Federal Trade Commission ("FTC") and Tapestry Inc. ("Tapestry"). Given my position at Cult Gaia, I am familiar with the type of information contained in the documents at issue and their competitive significance for Cult Gaia and its business. Upon review of the documents and the Protective Order, I submit that the disclosure of these documents to the public and to competitors of Cult Gaia would cause serious competitive injury to Cult Gaia.

3. Cult Gaia is a Los Angeles-based fashion brand that sells clothing, accessories, and shoes. In the ordinary course of business, [REDACTED]





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DX0931	Deposition transcript of Jasmin Larian (Cult Gaia)	7/18/2024		
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5. PX3002-3009 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. PX3014 is [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. PX5050 and DX0931 is [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. DX0650 is Cult Gaia's [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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9. If any of the Confidential Documents were to become publicly available, Cult Gaia would face serious competitive harm. Cult Gaia produced the Confidential Documents believing they would be covered by the Protective Order in place in this matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed September 10, 2024 at Los Angeles, California.

/s/ Jasmin Larian  
Jasmin Larian

## **EXHIBIT D**

Exhibit Nos. PX3002, PX3003, PX3004,  
PX3005, PX3006, PX3007, PX3008,  
PX3009

Exhibit No. PX3002

**Confidential - Redacted in Entirety**

Exhibit No. PX3003

**Confidential - Redacted in Entirety**

Exhibit No. PX3004

**Confidential - Redacted in Entirety**

Exhibit No. PX3005

**Confidential - Redacted in Entirety**



Exhibit No. PX3006

**Confidential - Redacted in Entirety**

Exhibit No. PX3007

**Confidential - Redacted in Entirety**

Exhibit No. PX3008

**Confidential - Redacted in Entirety**

Exhibit No. PX3009

**Confidential - Redacted in Entirety**

# **EXHIBIT E**

Exhibit No. PX3014

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DUNNINGTON  
BARTHOLOW & MILLER LLP

ATTORNEYS AT LAW

230 Park Avenue | New York, NY 10169 | Telephone: 212.682.8811 | www.dunnington.com | omedenica@dunnington.com

**CONFIDENTIAL MATERIAL**

July 8, 2024

VIA EMAIL and SHAREFILE

Tapestry Inc.

Latham & Watkins LLP

c/o David Johnson

555 Eleventh Street, NW, Suite 1000

Washington D.C. 20004

TLSPM\_Latham\_Sunrise@transperfect.com; David.Johnson@lw.com; Chris.Brown@lw.com;

Kimon.Triantafyllou@lw.com; Brian.Nowak@lw.com; Patrick.Dezil@lw.com;

BAFish@wlrk.com; Karen.Kim@lw.com; Emily.Viola@lw.com; Daniel.Reid@lw.com;

Chris.Yates@LW.com

Federal Trade Commission

c/o Nicole Lindquist

600 Pennsylvania Avenue NW

Washington, DC 20580

adennis@ftc.gov; dquinn@ftc.gov; alowdon@ftc.gov; brisenmay@ftc.gov; bboxbaum@ftc.gov;

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pcolwell@ftc.gov; skerman@ftc.gov; tsinger@ftc.gov; vsims@ftc.gov

Re: Federal Trade Commission v. Tapestry, Inc., No. 1:24-cv-03109-JLR (S.D.N.Y.) -  
Discovery

Dear Sir, Madam,

Dunnington, Bartholow & Miller LLP represents Cult Gaia LLC (“Cult Gaia”) in the above-captioned matter. On May 15, 2024, Tapestry Inc. and the Federal Trade Commission (together, the “Parties”) served document subpoenas on Cult Gaia. After Cult Gaia produced responsive documents on June 13, 2024, the Parties requested additional information, to be provided in narrative form. Cult Gaia hereby supplements its document production:

█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

CG00291



# **EXHIBIT F**

Exhibit Nos. PX5050 and  
DX0931

**Confidential - Redacted in Entirety**



# **EXHIBIT G**

Exhibit No. DX0650

**Confidential - Redacted in Entirety**