

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES
Washington, D.C.

PUBLIC DOCUMENT



In the Matter of

ECM BioFilms, Inc.,
a corporation, also d/b/a
Envioplastics International,

Respondent.

Docket No. 9358

ORIGINAL

PUBLIC DOCUMENT

RESPONDENT'S OBJECTIONS TO COMPLAINT COUNSEL'S FINAL PROPOSED EXHIBITS

In accord with the Court's Third Revised Scheduling Order (May 21, 2014), ECM Biofilms ("ECM") hereby respectfully submits its objections to Complaint Counsel's final proposed exhibit list.

ECM reserves the right to make appropriate objections to any exhibit Complaint Counsel may offer into evidence at hearing based on (1) relevancy; (2) foundation; (3) hearsay; and (4) any additional bases for objection recognized under the Federal Rules of Evidence or the Rules of Practice of the Federal Trade Commission. Under Rule 3.33(g) of the FTC's Rules of Practice (16 C.F.R. § 3.33(g)), ECM hereby objects to the introduction or use of deposition exhibits or testimony on any basis which would require the exclusion of the evidence or testimony were the witness is not present and testifying.¹ ECM preserves and renews all objections presented through motion, including motions *in limine*. ECM further reserves its right to make appropriate objections to documents offered with limited admissibility, or object to witness-sponsored

¹ See, e.g., ECM's Objections to Complaint Counsel's Final Proposed Witness List (July 18, 2014).

PUBLIC DOCUMENT

exhibits offered for purposes as yet unknown to ECM. ECM hereby reserves the right to make objections to testimony or documents on grounds of: irrelevance; unreliable hearsay; lack of materiality; prejudice that overcomes probative value; unfair prejudice; confusion of the issues; misleadingness; undue delay, waste of time, or needless presentation of cumulative evidence; and/or unreliability of third party records.

Finally, the admissibility of documents may be determined by the purpose for which those documents are offered. ECM sets forth here its general objections to documents offered by Complaint Counsel for purposes presently unknown to ECM.² To the extent ECM includes overlapping exhibits in its Final Proposed Exhibit List, ECM does not object to the admissibility of those documents *per se*, but lists specific objections hereinbelow to preserve its right to object based on the potential or anticipated use of those documents by Complaint Counsel.

² For instance, ECM might object to the use of hearsay within ECM correspondence (e.g., emails), unless the statement was offered for a non-hearsay purpose.

PUBLIC DOCUMENT

<u>Exhibit</u>	<u>Bates No.</u>	<u>Grounds for Objection</u>
CCX-00	ECM-113045- ECM-113045	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-0	ECM-FTC- 000065- ECM-FTC- 000065	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-1	ECM-FTC-000015- ECM-FTC-000015	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-2	ECM-FTC-000016- ECM-FTC-000016	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-3	ECM-FTC-000017- ECM-FTC-000017	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-4	ECM-FTC-000044- ECM-FTC-000044	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-5	ECM-FTC-000053- ECM-FTC-000053	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-6	ECM-FTC-000058- ECM-FTC-000058	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-7	ECM-FTC-000062- ECM-FTC-000074	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-8	ECM-FTC-000066- ECM-FTC-000066	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-9	ECM-FTC-000067- ECM-FTC-000067	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-10	ECM-FTC-000481- ECM-FTC-000481	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-11	ECM-FTC-000488- ECM-FTC-000489	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-12	ECM-FTC-000492- ECM-FTC-000492	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-13	ECM-FTC-000551- ECM-FTC-000551	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-14	ECM-FTC-000552- ECM-FTC-000552	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-15	ECM-001882- ECM-001882	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-16	ECM-001883- ECM-001894	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.

PUBLIC DOCUMENT

CCX-17	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-18	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-19	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-20	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-21	ECM-FTC-000553- ECM-FTC-000583	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-22	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-23	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-24	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-25	-	ECM objects that the exhibit is irrelevant, redundant, and cumulative of other evidence presented in the case.
CCX-26	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court. ³
CCX-27	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.

³ ECM notes that the NAD decisions referenced herein are subject to an ECM motion *in limine*.

PUBLIC DOCUMENT

CCX-28	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-29	ECM-112313- ECM-112315	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-30	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-31	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-32	ECM-114289- ECM-114289	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-33	APS-FTC 008676- APS-FTC 008676	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-34	APS-FTC 008916- APS-FTC 008917	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-35	APS-FTC 009291- APS-FTC 009292	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-36	APS-FTC 009431- APS-FTC 00942	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-36A	ECM-112331- ECM-112333	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-37	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-38	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-39	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-40	CE003- CE004	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-41	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-42	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-43	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-44	ECM-114511-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-45	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-46	ECM-113079- ECM-113079	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-47	ECM-113080- ECM-113080	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-48	ECM-112385- ECM-112390	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-49	ECM-114313- ECM-114313	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-50	ECM-113035- ECM-113042	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-51	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-52	FPI-FTC00000027- FPI-FTC00000027	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-53	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-54	ECM-113763- ECM-113763	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-55	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-56	ECM-113268- ECM-113268	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.

PUBLIC DOCUMENT

CCX-57	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-58	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-59	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-60	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-61	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-62	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-63	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-64	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-65	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-66	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-67	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-68	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-69	Shields000019-Shields000019	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-70	Shields000022-Shields000022	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-71	Shields000013-Shields000013	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-72	Shields000025-Shields000025	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-73	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This author, however, is available to testify and should be called to testify and should be called to testify at the Hearing.
CCX-74	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-75	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-76	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-77	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-78	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-79	EA000098- EA000098	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-80	-	No objection.
CCX-81	-	No objection.
CCX-82	-	No objection.
CCX-83	-	No objection.
CCX-84	-	No objection.
CCX-85	-	No objection.
CCX-86	-	No objection.
CCX-87	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception.
CCX-88	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception. The document is irrelevant, not probative, and immaterial.
CCX-89	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception. The document is irrelevant, not probative, and immaterial.
CCX-90	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception. The document is irrelevant, not probative, and immaterial.
CCX-91	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception.
CCX-92	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception. The document is irrelevant, not probative, and immaterial.
CCX-93	-	ECM objects to this exhibit that portions of it contain unreliable hearsay that does not fall into a hearsay exception. The document is irrelevant, not probative, and immaterial.

PUBLIC DOCUMENT

CCX-94	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-95	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-96	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-97	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-98	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-99	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-100	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-101	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-102	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-103	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-104	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-105	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.

PUBLIC DOCUMENT

CCX-106	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-107	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-108	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-109	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-110	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-111	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-112	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-113	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-114	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-115	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-116	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-117	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.

PUBLIC DOCUMENT

CCX-118	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-119	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-120	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-121	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-122	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-123	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-124	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-125	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-126	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-127	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-128	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-129	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.

PUBLIC DOCUMENT

CCX-130	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-131	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-132	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-133	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-134	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-135	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-136	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-137	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-138	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-139	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-140	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-141	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.

PUBLIC DOCUMENT

CCX-142	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-143	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-144	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-145	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-146	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-147	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-148	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-149	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-150	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-151	-	ECM objects that the images and photos are redundant and cumulative of other evidence presented in the case. The images are also unreliable hearsay without an exception. The images lack a proper foundation and are irrelevant.
CCX-152	-	ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-153	3M00000191- 3M00000218	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This author, however, is available to testify and should be called to testify at the Hearing.

PUBLIC DOCUMENT

CCX-154	3M00000117- 3M00000133	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This author, however, is available to testify and should be called to testify at the Hearing.
CCX-155	3M-FTC0000827-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This author, however, is available to testify and should be called to testify at the Hearing.
CCX-156	OWS001631- OWS001693	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This author, however, is available to testify and should be called to testify at the Hearing.
CCX-157	ECM-114733- ECM-114740	No objection.
CCX-158	COV000011- COV000025	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-159	ECM-FTC-000124- ECM-FTC-000162	No objection.
CCX-160	ECM-112225- ECM-112239	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-161	ECM-112026- ECM-112079	No objection.
CCX-162	ECM-112080- ECM-112131	No objection.
CCX-163	ECM-113608- ECM-113625	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-164	ELS_ECM000001- ELS_ECM000009	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM reserves all objections, including those presented in pending motions <i>in limine</i> .

PUBLIC DOCUMENT

CCX-165	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-166	ELS_ECM000013- ELS_ECM000013	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-167	ELS_ECM000172- ELS_ECM000172	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-168	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-169	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-170	OWS001325- OWS001334	No objection per the parties' stipulations.
CCX-171	ECM-114219- ECM-114233	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or are irrelevant.
CCX-172	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-173	-	No objection.
CCX-174	-	No objection per the parties' stipulations.
CCX-175	-	No objection per the parties' stipulations.
CCX-176	-	No objection per the parties' stipulations.

PUBLIC DOCUMENT

CCX-177	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those pending before the Court through motions <i>in limine</i> . The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-178	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those pending before the Court through motions <i>in limine</i> . The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-179	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those pending before the Court through motions <i>in limine</i> . The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-180	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those pending before the Court through motions <i>in limine</i> . The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-181	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those pending before the Court through motions <i>in limine</i> . The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.

PUBLIC DOCUMENT

CCX-182	ECM-054440- ECM-054441	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. The document is unreliable in nature, and exposes ECM to unfair prejudice that substantially outweighs any probative value.
CCX-183	ECM-044578- ECM-044583	ECM objects to this exhibit as irrelevant and to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-184	ECM-044565- ECM-044573	ECM objects to this exhibit as irrelevant and to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-185	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those before the Court in any pending motions. The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-186	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those before the Court in any pending motions. The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-187	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. ECM reserves its right to present all appropriate objections, including those before the Court in any pending motions. The decision misleads and subjects ECM to unfair prejudice that substantially outweighs any probative value.
CCX-188	-	ECM objects to this exhibit as lacking proper foundation and as irrelevant.
CCX-189	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document cannot be authenticated, and lacks indicia of reliability based on translation. The document is irrelevant.

PUBLIC DOCUMENT

CCX-190	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document cannot be authenticated, and lacks indicia of reliability based on translation. The document is irrelevant.
CCX-191	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document is irrelevant.
CCX-192	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document cannot be authenticated, and lacks indicia of reliability. The statement is not a proper declaration or affidavit, but is offered as same. The document is irrelevant.
CCX-193	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document cannot be authenticated, and lacks indicia of reliability. The statement is not a proper declaration or affidavit, but is offered as same. The document is irrelevant.
CCX-194	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. The document cannot be authenticated, and lacks indicia of reliability. The statement is not a proper declaration or affidavit, but is offered as same. The document is irrelevant.
CCX-195	-	ECM objects to this exhibit as irrelevant, misleading, and likely to create confusion of the issues.
CCX-196	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects to this exhibit as irrelevant.
CCX-197	-	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. ⁴
CCX-198	ECM-094497- ECM-094499	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

⁴ Although the parties discussed a waiver of evidentiary objections for ECM's database notations, that agreement was contingent on Complaint Counsel accepting those database entries in lieu of substantially more burdensome discovery procedures. Complaint Counsel ultimately

demand production of the entire production of ECM's emails files, which resulted in an overly burdensome, and nearly crippling, discovery process that had ECM produce over 100,000 pages of correspondence with customers. That correspondence is summarized in the database entries, which, in many cases, quote or paraphrase statements of third party witnesses. ECM limits hearsay exceptions to information not within the exception for statements by a party opponent.

PUBLIC DOCUMENT

CCX-199	ECM-097169- ECM-097169	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-200	ECM-097181- ECM-097182	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-201	ECM-100378- ECM-100384	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-202	ECM-100381- ECM-100384	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-203	ECM-100428- ECM-100429	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-204	ECM-100551- ECM-100569	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-205	ECM-100576- ECM-100595	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-206	ECM-100617- ECM-100619	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-207	ECM-100622- ECM-100632	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-208	ECM-100637- ECM-100655	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-209	ECM-100858- ECM-100863	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.

PUBLIC DOCUMENT

CCX-210	ECM-100860- ECM-100863	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-211	ECM-100958- ECM-100960	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-212	ECM-103124- ECM-103135	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-213	ECM-103151- ECM-103153	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-214	ECM-103162- ECM-103163	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-215	ECM-103350- ECM-103351	ECM objects to this exhibit as irrelevant.
CCX-216	ECM-103459- ECM-103462	ECM objects to this exhibit as irrelevant.
CCX-217	ECM-105225- ECM-105227	ECM objects to this exhibit as irrelevant.
CCX-218	ECM-105262- ECM-105265	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-219	ECM-105301- ECM-105304	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-220	ECM-105497- ECM-105498	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-221	ECM-105684- ECM-105689	ECM objects to this exhibit as irrelevant.
CCX-222	ECM-106903- ECM-106909	ECM objects to this exhibit as irrelevant.
CCX-223	ECM-106903- ECM-106919	ECM objects to this exhibit as irrelevant.
CCX-224	ECM-112269- ECM-112299	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-225	ECM-112640- ECM-112641	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-226	ECM-112653- ECM-112654	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.

PUBLIC DOCUMENT

CCX-227	ECM-114142- ECM-114155	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects to this exhibit as irrelevant.
CCX-228	ECM-114429- ECM-114466	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects to this exhibit as irrelevant.
CCX-229	ECM-FTC- 0000014- ECM-FTC- 0000014	No objection.
CCX-230	COV000312- COV000313	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-231	-	No objection.
CCX-232	-	No objection.
CCX-233	ECM-113444- ECM-113447	ECM objects that exhibit is irrelevant. Should this exhibit be admitted, ECM requests that it be subject to <i>in camera</i> treatment.
CCX-234	ECM-026373- ECM-026375	ECM objects that exhibit is irrelevant. Should this exhibit be admitted, ECM requests that it be subject to <i>in camera</i> treatment.
CCX-235	-	ECM objects that this exhibit is irrelevant. Should this exhibit be admitted, ECM requests that it be subject to <i>in camera</i> treatment.
CCX-236	-	No objection.
CCX-237	ECM-112318- ECM-112320	ECM objects that this exhibit is irrelevant.
CCX-238	ECM-112913- ECM-112913	No objection.
CCX-239	ECM-115010- ECM-115012	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-240	-	No objection.
CCX-241	-	ECM objects to the document on relevance grounds.
CCX-242	ECM-113351- ECM-113390	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-243	-	No objection per the parties' stipulations.
CCX-244	-	No objection.
CCX-245	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-246	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-246A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246C	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246D	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246E	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246F	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-246G	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that this exhibit is irrelevant.
CCX-246H	-	ECM objects that this exhibit is irrelevant.
CCX-246I	-	ECM objects that this exhibit is irrelevant.
CCX-246J	-	ECM objects that this exhibit is irrelevant.
CCX-246K	-	ECM objects that this exhibit is irrelevant.
CCX-247	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-248	-	ECM objects that this exhibit is irrelevant.
CCX-249	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-249A	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-249B	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-249C	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-249D	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-250	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-251	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-251A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-251B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-252	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-253	-	ECM objects that this exhibit is irrelevant.
CCX-254	COV000128- COV000129	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-255	COV000258- COV000259	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-256	COV000412- COV000412	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-257	EA000067- EA000068	No objection.
CCX-257A	-	No objection.
CCX-258	EA000073- EA000076	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-258A	-	No objection.
CCX-258B	-	No objection.
CCX-258C	-	No objection.
CCX-259	-	ECM objects that this exhibit is irrelevant.
CCX-259A	-	ECM objects to this document because it is cumulative and redundant to other evidence offered.
CCX-260	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-261	FPI-FTC00000076- FPI-FTC00000079	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-261A	-	No objection.
CCX-261B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-262	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-262A	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-262B	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-263	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-264	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-265	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-266	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-266A	-	No objection.
CCX-266B	-	No objection.
CCX-266C	-	No objection.
CCX-266D	-	No objection.
CCX-266E	-	No objection.
CCX-267	-	No objection.
CCX-267A	-	No objection.
CCX-267B	-	No objection.
CCX-267C	-	No objection.
CCX-267D	-	No objection.
CCX-267E	-	No objection.
CCX-267F	-	No objection.
CCX-267G	-	No objection.
CCX-267H	-	No objection.

PUBLIC DOCUMENT

CCX-267I	-	No objection.
CCX-267J	-	No objection.
CCX-267K	-	No objection.
CCX-267L	-	No objection.
CCX-268	-	No objection.
CCX-268A	-	No objection.
CCX-268B	-	No objection.
CCX-269	-	No objection.
CCX-269A	-	No objection.
CCX-270	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-270A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-270B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-271A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271C	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271D	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271E	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271F	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271G	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271H	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-271I	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM also objects that this exhibit is irrelevant.
CCX-271J	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM also objects that this exhibit is irrelevant.
CCX-272	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-272A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-273	-	ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception..
CCX-274	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-274A	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-274B	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-274C	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-275	ECM-014011- ECM-014013	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-276	ECM-016433- ECM-016435	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-277	ECM-018942- ECM-018946	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-278	ECM-035391- ECM-035397	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-279	ECM-059846- ECM-059850	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-280	ECM-102621- ECM-102623	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-281	ECM-106361- ECM-106362	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-282	ECM-109871- ECM-109873	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-283	ECM-111128- ECM-111129	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-284	ECM-091569-71- ECM-091571	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-285	ECM-096267- ECM-096267	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-286	ECM-105159- ECM-105159	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-287	ECM-109943- ECM-109943	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-288	ECM-049115- ECM-049115	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-289	ECM-011377- ECM-011378	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-290	ECM-012962- ECM-012967	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-291	ECM-013056- ECM-013057	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-292	ECM-024326- ECM-024327	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-293	ECM-028517- ECM-028518	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-294	ECM-039445- ECM-039446	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-295	ECM-050913- ECM-050914	ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-296	ECM-057533- ECM057543	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-297	ECM-080804- ECM-080805	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-298	ECM-006948- ECM-006949	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-299	ECM-019897- ECM-019899	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-300	ECM-021671- ECM-021673	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-301	ECM-022596- ECM-022599	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-302	ECM-033083- ECM-033085	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-303	ECM-043352- ECM-043353	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-304	ECM-074339- ECM-074340	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-305	ECM-075396- ECM-075399	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-306	ECM-081029- ECM-081031	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-307	ECM-007986- ECM-007993	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-308	ECM-075621- ECM-075623	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-309	ECM-080448- ECM-080449	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-310	ECM-017259- ECM-017260	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-311	ECM-017463- ECM-017464	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-312	ECM-018140- ECM-018142	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-313	ECM-022732- ECM-022733	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-314	ECM-023965- ECM-023968	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-315	ECM-029613- ECM-029615	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-316	ECM-037746- ECM-037746	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-317	ECM-079367- ECM-079369	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-318	ECM-080448 - ECM-080449	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-319	ECM-091380- ECM-091381	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-320	ECM-091567- ECM-091568	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-321	ECM-108193- ECM-108199	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-322	ECM-110295- ECM-110305	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-323	ECM-043546- ECM-043548	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-324	ECM-077409- ECM-077410	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-325	ECM-113600- ECM-113602	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-326	ECM-007876- ECM-007877	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-327	ECM-011154- ECM-011155	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-328	ECM-010479- ECM-010481	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-329	ECM-053171- ECM-053171	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-330	ECM-057832- ECM-057833	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-331	ECM-106910- ECM-106911	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-332	ECM-028156- ECM-028156	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-333	ECM-040159- ECM-040160	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-334	ECM-045401- ECM-045401	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-335	ECM-045405- ECM-045406	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-336	ECM-050085- ECM-050085	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-337	ECM-050425- ECM-050425	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-338	ECM-050569- ECM-050570	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-339	ECM-102554- ECM-102555	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-340	ECM-102999- ECM-103002	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-341	ECM-006349- ECM-109415	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-342	ECM-024493- ECM-024494	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-343	ECM-026942- ECM-026942	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-344	ECM-026944- ECM-026944	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-345	ECM-028015- ECM-028016	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-346	ECM-029634- ECM-029634	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-347	ECM-029829- ECM-029829	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-348	ECM-029832- ECM-029832	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-349	ECM-038848- ECM-038849	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-350	ECM-049229- ECM-049231	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-351	ECM-078253- ECM-078255	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-352	ECM-078864- ECM-078864	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-353	ECM-013147- ECM-013147	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-354	ECM-034086- ECM-034088	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-355	ECM-034902- ECM-034903	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-356	ECM-046975- ECM-046975	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-357	ECM-049799- ECM-049800	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-358	ECM-049950- ECM-049950	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-359	ECM-050802- ECM-050802	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-360	ECM-080448- ECM-080449	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-361	ECM-091366- ECM-091368	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-362	ECM-092120- ECM-092121	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-363	ECM-095265- ECM-095267	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-364	ECM-097710- ECM-097711	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-365	ECM-103169- ECM-103171	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-366	ECM-FTC-020316- ECM-FTC-020318	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-367	ECM_FTC- 037749- ECM_FTC-037755	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-368	ECM-035448- ECM-035449	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-369	ECM-060788- ECM-060790	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-370	ECM-080963- ECM-080963	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-371	ECM-099091- ECM-099094	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-372	ECM-104673- ECM-104673	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-373	ECM-110680- ECM-110680	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-374	ECM-085546- ECM-085552	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-375	ECM-022560- ECM-022560	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-376	ECM-022654- ECM-022654	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-377	ECM-022675- ECM-022676	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-378	ECM-056095- ECM-056095	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-379	ECM-106082- ECM-106082	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-380	ECM-106503- ECM-106503	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-381	ECM-017088- ECM-017095	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-382	ECM-032036- ECM-032042	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-383	ECM-032069- ECM-032070	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-384	ECM-046344- ECM-046346	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-385	ECM-048077- ECM-048078	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-386	ECM-100735- ECM-100739	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-387	ECM-108039 - ECM-108039	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-388	ECM-FTC-000869- ECM-FTC-000874	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-389	ECM-FTC-000926- ECM-FTC-000934	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-390	ECM-FTC-000985- ECM-FTC-000988	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-391	ECM-FTC-001052- ECM-FTC-001055	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-392	ECM-FTC-001063- ECM-FTC-001078	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-393	ECM-FTC-001100- ECM-FTC-001102	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-394	ECM-FTC-001121- ECM-FTC-001123	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-395	ECM-FTC-001157- ECM-FTC-001162	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-396	ECM-FTC-001195- ECM-FTC-001197	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-397	ECM-FTC-001214- ECM-FTC-001214	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-398	ECM-FTC-001342- ECM-FTC-001351	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-399	ECM-FTC-001353- ECM-FTC-001357	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-400	ECM-FTC-001388- ECM-FTC-001393	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-401	ECM-FTC-001394- ECM-FTC-001394	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-402	ECM-FTC-001454- ECM-FTC-001457	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-403	ECM-FTC-001688- ECM-FTC-001688	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-404	ECM-FTC-001734- ECM-FTC-001735	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-405	ECM-FTC-001750- ECM-FTC-001751	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-406	ECM-FTC-001760- ECM-FTC-001762	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-407	ECM-FTC-001763- ECM-FTC-001767	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-408	ECM-002001- ECM-002016	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-409	ECM-002115- ECM-002127	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-410	ECM-002175 - ECM-002214	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-411	ECM-002239- ECM-002261	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-412	ECM-002305- ECM-002337	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-413	ECM-002585- ECM-002587	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-414	ECM-002621- ECM-002639	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-415	ECM-002670- ECM-002707	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-416	ECM-002729- ECM-002740	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-417	ECM-003260- ECM-003273	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-418	ECM-003610- ECM-003619	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-419	ECM-003834- ECM-003865	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-420	ECM-004503- ECM-004503	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-421	ECM-004510- ECM-004543	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-422	ECM-005553- ECM-005638	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-423	ECM-005731- ECM-005739	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-424	ECM-FTC-000700- ECM-FTC-000701	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-425	ECM-FTC-000702- ECM-FTC-000703	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-426	ECM-FTC-000745- ECM-FTC-000747	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-427	ECM-FTC-000812- ECM-FTC-000815	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-428	ECM-FTC-000832- ECM-FTC-000834	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-429	ECM-FTC-000848- ECM-FTC-000852	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-430	ECM-FTC-000858 - ECM-FTC-000864	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.

PUBLIC DOCUMENT

CCX-821	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-751	-	No objection.
CCX-752	-	No objection.
CCX-753	3M00000182- 3M00000187	No objection.
CCX-754	3M00000191- 3M00000218	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-755	ECM-029844- ECM-029845	No objection.
CCX-756	3M00000015- 3M00000015	No objection.
CCX-757	3M00000007- 3M00000009	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-758	3M00000099- 3M00000107	ECM objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-759	3M00000163- 3M00000163	No objection.
CCX-760	3M00000072- 3M00000089	No objection.
CCX-761	3M00000090- 3M00000090	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-762	ECM-043352- ECM-043353	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-763	3M00000071- 3M00000071	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-764	3M00000066- 3M00000070	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-765	3M00000092- 3M00000096	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-766	3M00000032- 3M00000053	ECM objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-767	3M00000117- 3M00000133	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-768	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-769	ECM-048077- ECM-048078	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-770	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-771	ECM-113803- ECM-113858	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-772	ECM-075919- ECM-075920	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-773	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-822	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-823	-	No objection.
CCX-824	-	No objection.
CCX-825	-	No objection.
CCX-826	-	No objection.

PUBLIC DOCUMENT

CCX-827	-	No objection.
CCX-828	-	No objection.
CCX-829	ECM-FTC-000066- ECM-FTC-000066	No objection.
CCX-830	-	No objection.
CCX-799	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-780	-	No objection.
CCX-781	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-782	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-783	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant. ECM objects to the extent that the documents contain hearsay and the declarant is available to testify.
CCX-784	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-785	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant. ECM objects to the extent that the documents contain hearsay and the declarant is available to testify.
CCX-786	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation. ECM reserves all pending objections contained in motions before this court.
CCX-787	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-789	-	No objection.
CCX-790	COV000011- COV000025	ECM objects to this exhibit to the extent that it is needlessly cumulative and it lacks a proper foundation.
CCX-791	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-792	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-793	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-794	-	No objection.

PUBLIC DOCUMENT

CCX-795	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-796	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-797	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant. ECM objects to the extent that the documents contain hearsay and the declarant is available to testify.
CCX-798	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant. ECM objects to the extent that the documents contain hearsay and the declarant is available to testify.
CCX-431	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant. ECM objects to the extent that the documents contain hearsay and the declarant is available to testify.
CCX-432	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-433	-	No objection.

PUBLIC DOCUMENT

CCX-434	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-435	-	No objection.
CCX-436	-	No objection.
CCX-437	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-438	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-439	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-800	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-440	-	No objection.
CCX-441	-	No objection.
CCX-442	-	No objection.

PUBLIC DOCUMENT

CCX-443	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-444	ECM-080963- ECM-080963	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-445	ECM-FTC-000492- ECM-FTC-000492	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-446	ECM-FTC-000015- ECM-FTC-000015	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-447	ECM-FTC-000066- ECM-FTC-000066	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-448	ECM-FTC-000017- ECM-FTC-000017	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-449	ECM-111329- ECM-111330	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-801	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-802	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-450	-	No objection.

PUBLIC DOCUMENT

CCX-451	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-452	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-453	DWFP000000378- DWFP000000383	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-454	-	No objection.
CCX-455	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-456	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-457	ECM-001883- ECM-001894	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-458	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-459	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-460	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-461	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-462	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-463	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-464	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-465	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-466	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-467	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-468	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-469	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-470	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-471	ECM-014337- ECM-014337	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-472	ECM-114586- ECM-114587	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-473	ECM-114588- ECM-114589	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-474	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-475	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-476	ECM-017459- ECM-017460	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-477	ECM-017457- ECM-017458	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-478	ECM-017843- ECM-017844	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-479	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-480	ECM-017819- ECM-017821	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-481	ECM-023704- ECM-023705	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-482	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-483	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-484	ECM-077884- ECM-077885	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative.
CCX-485	DWFP000004255- DWFP000004260	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-486	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-487	DWFP000006190- DWFP000006201	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-488	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-489	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-803	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-490	-	No objection.
CCX-491	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.

PUBLIC DOCUMENT

CCX-492	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-493	-	No objection.
CCX-494	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-495	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-496	DTE00001- DTE00002	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-497	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative and lacks a proper foundation.
CCX-498	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit is irrelevant.
CCX-499	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-500	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-501	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-502	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-503	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-504	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-505	ECM-FTC-000930- ECM-FTC-000930	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule. <i>See</i> footnote 4.
CCX-506	ECM-024326- ECM-024327	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-507	ECM-090869- ECM-090878	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-804	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-508	-	No objection.
CCX-509	-	No objection.
CCX-510	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-511	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. Letter

PUBLIC DOCUMENT

CCX-512	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-513	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-514	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-515	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-516	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-805	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-806	-	No objection.
CCX-807	-	No objection.
CCX-517	-	No objection.
CCX-518	-	No objection.
CCX-519	-	No objection.
CCX-520	-	No objection.
CCX-521	-	No objection.
CCX-522	-	No objection.
CCX-523	ECM-045862- ECM-045862	ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-524	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that this exhibit is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-525	-	ECM objects that this exhibit is irrelevant.

PUBLIC DOCUMENT

CCX-526	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that this exhibit is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-527	-	ECM objects that this exhibit is irrelevant.
CCX-528	-	ECM objects that this exhibit is irrelevant.
CCX-529	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-530	FP00004027- FP00004027	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-531	-	No objection.
CCX-532	-	No objection.
CCX-533	-	No objection.
CCX-534	-	No objection.
CCX-535	DWFP00000022- DWFP00000025	No objection.
CCX-536	ECM-082656- ECM-082658	No objection.
CCX-537	-	No objection.
CCX-538	-	No objection.
CCX-539	-	No objection.
CCX-540	-	No objection.
CCX-541	-	ECM objects that the exhibit contains unreliable hearsay without an exception.
CCX-542	-	ECM objects that the exhibit contains unreliable hearsay without an exception.
CCX-543	-	No objection.
CCX-544	-	No objection.
CCX-545	-	No objection.
CCX-546	-	No objection.
CCX-547	-	No objection.
CCX-548	-	No objection.
CCX-808	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-549	-	No objection.

PUBLIC DOCUMENT

CCX-550	ELS_ECM000001- ELS_ECM000009	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM hereby adopts and reserves all arguments presented in motions before this court, and reserves all appropriate objections concerning this document and the sponsor's testimony.
CCX-551	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-552	ELS_ECM000013- ELS_ECM000013	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-553	ELS_ECM000172- ELS_ECM000172	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-554	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-555	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-809	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-556	-	No objection.
CCX-557	-	No objection.
CCX-558	ECM-FTC-000017- ECM-FTC-000017	No objection.
CCX-559	ECM-024505- ECM-024506	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-560	ECM-FTC-000066- ECM-FTC-000066	No objection.
CCX-561	ECM-022389- ECM-022390	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-562	ECM-006251- ECM-006252	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-810	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-562	-	No objection.
CCX-563	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-564	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-565	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-566	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-567	-	No objection.
CCX-568	ECM-017042- ECM-017042	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-569	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-570	ECM-038499- ECM-038506	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-571	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case; the document appears repeatedly in Complaint Counsel's witness list, and is objectionable for the same reasons stated hereinabove.

PUBLIC DOCUMENT

CCX-572	-	No objection per the parties' stipulations.
CCX-573	-	No objection per the parties' stipulations.
CCX-574	-	No objection per the parties' stipulations.
CCX-575	ECM-008779- ECM-008780	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-576	ECM-FTC-000106- ECM-FTC-000123	No objection.
CCX-577	ECM-038520- ECM-038520	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-578	-	ECM objects on grounds that this is legal precedent; the document is irrelevant, and inappropriate as a fact exhibit.
CCX-579	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-580	ECM-039130- ECM-039131	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-581	-	ECM objects that the exhibit is cumulative.
CCX-582	-	ECM objects that the exhibit is cumulative.
CCX-583	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-584	-	ECM objects that the exhibit contains unreliable hearsay without an exception to the extent offered as an exhibit with fact witnesses. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-585	-	ECM objects that the exhibit contains unreliable hearsay without an exception to the extent offered as an exhibit with fact witnesses. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-586	-	ECM objects that the exhibit contains unreliable hearsay without an exception to the extent offered as an exhibit with fact witnesses. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-587	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-588	-	No objection.
CCX-589	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.

PUBLIC DOCUMENT

CCX-590	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-591	FP00004027- FP00004027	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-592	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-593	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-594	-	No objection.
CCX-595	-	No objection.
CCX-596	-	No objection.
CCX-597	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-598	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-599	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-600	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-601	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-602	ECM-045254- ECM-045255	ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-603	ECM-039708- ECM-039715	ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-604	ECM-039708- ECM-039715	ECM objects that the exhibit is irrelevant. ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.

PUBLIC DOCUMENT

CCX-605	ECM-011221- ECM-011221	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-606	ECM-011760- ECM-011761	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-607	-	No objection.
CCX-608	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-609	FP00000132- FP00000133	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-610	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-811	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-611	-	No objection.
CCX-612	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-613	-	No objection.
CCX-614	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-615	-	ECM objects to this exhibit because it is needlessly cumulative and redundant; the document is listed repeatedly as an exhibit in Complaint Counsel's list. For the reasons set for the hereinabove in response to the same document, ECM objects.

PUBLIC DOCUMENT

CCX-616	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-617	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-618	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-618a	-	ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-619	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit is irrelevant.
CCX-620	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-621	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-622	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-623	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-624	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-625	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-626	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.

PUBLIC DOCUMENT

CCX-627	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-812	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-831	-	No objection.
CCX-832	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.
CCX-833	-	No objection.
CCX-834	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-835	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-836	ECM-007959- ECM-007960	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-837	ECM-FTC-000015- ECM-FTC-000015	No objection.
CCX-838	-	No objection.
CCX-839	ECM-FTC-000017- ECM-FTC-000017	No objection.
CCX-840	ECM-FTC-000053- ECM-FTC-000054	No objection.
CCX-628	ECM-FTC-000058- ECM-FTC-000058	No objection.
CCX-629	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. ECM objects due to a lack of a proper foundation. The author of this document is available to testify, and should be required to testify if this document is admitted against the foregoing objections.

PUBLIC DOCUMENT

CCX-630	ECM-FTC-000066- ECM-FTC-000066	No objection.
CCX-813	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-814	-	No objection.
CCX-631	ECM-021671- ECM-021673	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-632	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-633	ECM-024493- ECM-024494	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-634	-	ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant.
CCX-635	ECM-FTC-000700- ECM-FTC-000701	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case.
CCX-636	ECM-FTC-000066- ECM-FTC-000066	No objection.
CCX-637	ECM-FTC-000551- ECM-FTC-000551	No objection.
CCX-638	ECM-018942- ECM-018946	ECM objects to this exhibit to the extent that it contains unreliable hearsay that does not fall into a hearsay exception.
CCX-639	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-640	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-641	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-642	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-643	-	No objection.
CCX-644	ECM-001883- ECM-001894	ECM objects to this exhibit to the extent that it is needlessly cumulative
CCX-645	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author of this document (or information contained therein) is available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-646	ECM-016433- ECM-016435	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-647	ECM-FTC-001063- ECM-FTC-001078	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule.

PUBLIC DOCUMENT

CCX-648	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-649	ECM-025900- ECM-025902	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-650	ECM-045731- ECM-045736	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-651	ECM-047519- ECM-047521	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-652	ECM-022596- ECM-022599	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-653	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.

PUBLIC DOCUMENT

CCX-654	ECM-022097- ECM-022101	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-655	ECM-048249- ECM-048250	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-656	ECM-FTC-000492- ECM-FTC-000492	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-657	ECM-048611- ECM-048614	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-658	ECM-047101- ECM-047103	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-659	ECM-046344- ECM-046346	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-660	COV000011- COV000025	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-661	ECM-003260- ECM-003273	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-662	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-815	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-663	-	ECM has no objection.
CCX-664	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-665	DWFP00000008- DWFP00000013	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-666	FTC_Prod_000094- FTC_Prod_000100	ECM has no objection.
CCX-667	FTC_Prod_000158- FTC_Prod_000164	ECM has no objection.

PUBLIC DOCUMENT

CCX-668	FTC_Prod_00265- FTC_Prod_00271	ECM has no objection.
CCX-669	ECM-112240- ECM-112243	ECM has no objection.
CCX-670	DWFP00000003- DWFP00000007	ECM has no objection.
CCX-671	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-672	-	ECM has no objection.
CCX-673	-	ECM has no objection.
CCX-674	-	ECM has no objection.
CCX-816	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-675	-	ECM has no objection.
CCX-676	ECM-012291- ECM-012295	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-677	ECM-013056- ECM-013057	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-678	ECM-049229- ECM-049231	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-679	ECM-FTC-000015- ECM-FTC-000015	ECM has no objection.
CCX-680	ECM-FTC-000552- ECM-FTC-000552	ECM has no objection.
CCX-681	ECM-015566- ECM-015568	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-682	ECM-007986- ECM-007993	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-683	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-684	-	ECM objects to this exhibit to the extent that it is needlessly cumulative.
CCX-685	ECM-001883- ECM-001894	ECM objects to this exhibit to the extent that it is needlessly cumulative.

PUBLIC DOCUMENT

CCX-686	ECM-022997- ECM-022998	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-687	ECM-014011- ECM-014013	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-688	ECM-001882- ECM-001882	ECM has no objection.
CCX-689	ECM-014971- ECM-014973	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-690	ECM-033559- ECM-033561	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-691	ECM-020665- ECM-020665	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-692	ECM-018280- ECM-018281	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-693	-	ECM has no objection.
CCX-694	-	ECM objects to this exhibit because it is incomplete, unreliable, and irrelevant.
CCX-695	ECM-028744- ECM-028750	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-696	ECM-012588- ECM-012589	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-697	-	ECM objects that the exhibit is redundant and cumulative of other evidence presented in the case. ECM objects that the exhibit contains unreliable hearsay without an exception. ECM objects that the exhibit lacks a proper foundation and is irrelevant. This decision was based upon facts and evidence not in this record, and law that is not applicable to this proceeding. The probative value of the exhibit is substantially outweighed by the prejudice to ECM, and would confuse the issues before the court.
CCX-698	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-699	ECM-012962- ECM-012967	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.

PUBLIC DOCUMENT

CCX-700	ECM-024326- ECM-024327	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-701	ECM-00000(1)- ECM-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-702	ECM-FTC-000106- ECM-FTC-000123	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-703	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-704	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-705	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.

PUBLIC DOCUMENT

CCX-706	ECM-033669- ECM-033669	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-707	ECM-017259- ECM-017260	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, contains irrelevant information that is not probative or material, and is unfairly prejudicial.
CCX-708	ECM-017463- ECM-017464	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-709	ECM-023965- ECM-023968	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-710	ECM-015599- ECM-015600	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-711	ECM-022675- ECM-022676	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-712	ECM-008003- ECM-008005	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-713	ECM-006948- ECM-006949	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-714	ECM-019897- ECM-019899	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-715	ECM-016622- ECM-016627	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-716	ECM-FTC-000832- ECM-FTC-000834	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule.
CCX-717	ECM-017088- ECM-017095	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-718	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-719	ECM-FTC-001052- ECM-FTC-001055	ECM objects to this exhibit to the extent that it contains unreliable double hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material. ECM objects on the basis of the best evidence rule.
CCX-720	-	ECM has no objection per the parties' stipulations.
CCX-721	COV000011- COV000025	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-722	ECM-033762- ECM-033763	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception. The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-723	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-817	-	ECM does not object to the inclusion of portions of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes as yet unknown to ECM, including the following: the deponent is available to testify, and should be required to testify if this document is admitted against ECM's objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-724	-	ECM has no objection.
CCX-725	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-726	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-727	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception (including notes affixed to the document). The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.
CCX-728	-	No objection.
CCX-818	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-819	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-729	-	No objection.
CCX-730	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-731	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-732	ECM-FTC-000106- ECM-FTC-000123	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.

PUBLIC DOCUMENT

CCX-733	ECM-FTC-000124- ECM-FTC-000162	No objection per the parties' stipulations.
CCX-734	ECM-FTC-000186- ECM-FTC-000197	No objection.
CCX-735	ECM-FTC-000171- ECM-FTC-000185	No objection.
CCX-736	ECM-FTC-000198- ECM-FTC-000205	No objection.
CCX-737	ECM-FTC-000163- ECM-FTC-000170	No objection.
CCX-738	ECM-FTC-000206- ECM-FTC-000225	No objection.
CCX-739	ECM-FTC-000069- ECM-FTC-000081	No objection.
CCX-740	ECM-FTC-000230- ECM-FTC-000241	No objection.
CCX-741	ECM-FTC-000226- ECM-FTC-000229	No objection.
CCX-742	ECM-FTC-000501- ECM-FTC-000501	No objection.
CCX-743	ECM-FTC-000503- ECM-FTC-000505	No objection.
CCX-744	ECM-FTC-000501- ECM-FTC-000502	No objection.
CCX-745	ECM-FTC-000506- ECM-FTC-000509	No objection.
CCX-746	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-747	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-748	-	ECM objects to this exhibit to the extent that it contains unreliable hearsay without an exception (including notes affixed to the document). The author(s) or declarant(s) (in whole or in part) are available to testify, and should be required to testify if this document is admitted against the foregoing objections. ECM also objects to this exhibit to the extent that it is needlessly cumulative, lacks a proper foundation, and contains irrelevant information that is not probative or material.

PUBLIC DOCUMENT

CCX-820	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-749	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.
CCX-750	-	ECM does not object to the inclusion of this document <i>per se</i> , but reserves all objections to the extent Complaint Counsel offers same for purposes that are needlessly cumulative, lack a proper foundation, or irrelevant.

Respectfully submitted,

/s/ Jonathan W. Emord
Jonathan W. Emord
EMORD & ASSOCIATES, P.C.
11808 Wolf Run Lane
Clifton, VA 20124
Telephone: 202-466-6937

DATED: July 18, 2014

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2014, I caused a true and correct copy of the paper original of the foregoing document to be served as follows:

One electronic copy to the **Office of the Secretary** filed through the Federal Trade Commission's E-Filing System:

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Room H-113
Washington, DC 20580
Email: secretary@ftc.gov

One electronic courtesy copy to the **Office of the Administrative Law Judge**:

The Honorable D. Michael Chappell
Administrative Law Judge
600 Pennsylvania Ave., NW, Room H-110
Washington, DC 20580

One electronic copy to **Counsel for Complainant**:

Katherine Johnson
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail stop M-8102B
Washington, D.C. 20580
Email: kjohnson3@ftc.gov

Elisa Jillson
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail stop M-8102B
Washington, D.C. 20580
Email: ejillson@ftc.gov

Jonathan Cohen
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail stop M-8102B
Washington, D.C. 20580
Email: jcohen2@ftc.gov

Arturo Decastro
Division of Enforcement
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail stop M-8102B
Washington, D.C. 20580
Email: adecastro@ftc.gov

PUBLIC DOCUMENT

I further certify that I retain a paper copy of the signed original of the foregoing document that is available for review by the parties and adjudicator consistent with the Commission's Rules.

/s/ Jonathan W. Emord
Jonathan W. Emord
EMORD & ASSOCIATES, P.C.
11808 Wolf Run Lane
Clifton, VA 20124