



United States of America  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580

Division of Advertising Practices

November 29, 2018

**Via Email and First Class Mail**

Jonathan B. Pitt  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, D.C. 20005  
JPitt@wc.com

Re: CIDs issued to viagogo Inc., viagogo Entertainment Inc., Pugnacious Endeavors, Inc., Grover Street, Inc., and Grover Street Holdings, Inc. on September 13, 2018

Dear Mr. Schmidtlein:

I am writing in regard to the Civil Investigative Demands (CIDs) directed to your clients, viagogo Inc., viagogo Entertainment Inc., Pugnacious Endeavors, Inc., Grover Street, Inc., and Grover Street Holdings, Inc. dated September 13, 2018. Pursuant to 16 C.F.R. § 2.7(l), I hereby withdraw the CIDs.

Based on your conversations with staff, it is our understanding that subsequent to receipt of this notice you will formally withdraw the pending Petition to Limit CIDs filed on November 9, 2018 (with the corrected filing made on November 26). You can formally withdraw the petition with a letter directed to the Secretary of the Commission.

If you have further questions, please contact Sara DePaul at (202) 326-3429.

Very truly yours,

Mary K. Engle  
Associate Director

cc: John E. Schmidtlein (via email only, jschmidtlein@wc.com)  
Thomas Ryan (via email only, TRyan@wc.com)