

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

In the Matter of)
)
Louisiana Real Estate Appraisers Board,)
)
 Respondents) DOCKET NO. 9374
_____)

**NON-PARTY DART APPRAISAL'S
MOTION FOR *IN CAMERA* TREATMENT**

Counsel for non-party Dart Appraisal (“Dart”), pursuant to Rule 3.45(b) of the Federal Trade Commission’s Rules of Practice. 16 C.F.R. § 3.45(b), respectfully moves this Court for *in camera* treatment for five years for four competitively-sensitive, confidential business documents (the “Confidential Documents”).

Respectfully submitted,

/s Adam J. Biegel
Adam J. Biegel
Hilla Shimshoni
ALSTON & BIRD LLP
950 F Street, NW
Washington, DC 20004
Phone: (202) 239-3300
Adam.Biegel@alston.com
Hilla.Shimshoni@alston.com

*Counsel for Non-Party
Dart Appraisal*

DATED: March 12, 2021

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

In the Matter of)	
)	
Louisiana Real Estate Appraisers Board,)	
)	DOCKET NO. 9374
Respondents)	
)	

**NON-PARTY DART APPRAISAL'S
MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION FOR *IN CAMERA* TREATMENT**

Pursuant to Rule 3.45(b) of the Federal Trade Commission's Rules of Practice. 16 C.F.R. § 3.45(b), counsel for non-party Dart Appraisal ("Dart" or "the Company") submits this Memorandum of Law in support of Dart's motion, filed this date, for *in camera* treatment for five years for four competitively-sensitive, confidential business documents (the "Confidential Documents"). Dart Appraisal is a nationwide independent appraisal management company.

Counsel for The Federal Trade Commission ("FTC") and counsel for Respondent Louisiana Real Estate Appraisers Board ("LREAB") have stated that they do not intend to oppose Dart's Motion. A corresponding Statement Regarding Meet and Confer is appended to this Memorandum.

Dart produced the Confidential Documents in response to non-party subpoenas in this matter. The FTC has now notified Dart that it intends to introduce four of the Confidential Documents into evidence at the administrative trial in this matter, and Respondent LREAB has notified Dart that it intends to introduce three of the Confidential Documents into evidence at the administrative trial in this matter. *See* Letter from the FTC dated June 20, 2019 (attached as Exhibit A); Letter from LREAB dated June 20, 2019 (attached as Exhibit B).

The exhibits for which Dart is seeking *in camera* treatment are confidential business documents that contain information regarding Dart’s fees, methodology for setting the fees, and detailed geographic scope of operations. If these documents were to become part of the public record, Dart would be significantly harmed. For the reasons discussed in this motion, Dart respectfully requests that the Confidential Documents be afforded *in camera* treatment. In support of the motion, Dart relies on the Affidavit of Michael Dresden, President at Dart (“Dresden Declaration”), attached as Exhibit C, which provides additional details regarding the Confidential Documents.

I. The Documents for Which Protection is Sought

Dart seeks *in camera* treatment for the following Confidential Documents, copies of which are attached under seal in Exhibit D.

Exhibit No.	Document Title/Description	Date	Beginning Bates No.	Ending Bates No.
CX3272 ¹ / RX0571	Email from Hilla Shimshoni to Lisa Kopchik, Christine Kennedy, Adam Biegel, et al. re: Civil Investigative Demand issues to Dart Appraisal in the Matter of Louisiana Real Estate Appraisal Board, FTC File No. 161-0068 w/Attach: DART cover letter and cert	07/01/2016	FTC-PROD-0005264	FTC-PROD-0005269
	Spreadsheet: Dart’s CID Response (Spec. 2)	06/30/2016	DART-0002	DART-0002
CX3272 ² / RX0573	Spreadsheet: Dart’s CID Response (Spec. 1)	07/01/2016	FTC-PROD-0005275	FTC-PROD-0005275

¹ The FTC’s Exhibit CX3272 also contains three documents marked DART-0001-0004. With the exception of DART-0002, these additional documents are marked as separate exhibits by LREAB. DART-0002 is not identified as an exhibit by LREAB.

² FTC-PROD-0005275 is also marked as DART-0001, and is identified by the FTC as part of CX3272 (with the date of 6/30/2016) (see above).

CX3272 ³ RX0572	Document: Dart's CID Response (Spec. 3-4) / Dart Appraisal Customary and Reasonable Fee Process	07/01/2016	FTC-PROD- 0005277	FTC-PROD- 0005279
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**II. Dart's Documents are Secret and Material to Dart's Business and Their Disclosure
Would Result in Serious Injury to Company**

In camera treatment of material is appropriate when its “public disclosure will likely result in a clearly defined, serious injury to the person, partnership, or corporation requesting” such treatment. 16 C.F.R. § 3.45(b). The proponent demonstrates serious competitive injury by showing that the documents are secret and that they are material to the business. *In re 1-800 Contacts, Inc.*, No. 9372, 2017 FTC LEXIS 55, at *2-3 (Apr. 4, 2017); *In re Gen. Foods Corp.*, 95 F.T.C. 352, 355 (1980); *In re Dura Lube Corp.*, No. 9292, 1999 FTC. LEXIS 255, at *5 (Dec. 23, 1999). In this context, courts generally attempt “to protect confidential business information from unnecessary airing.” *H.P. Hood & Sons, Inc.*, 58 F.T.C. 1184, 1188 (1961).

In considering both secrecy and materiality, the Court may consider: (1) the extent to which the information is known outside of the business; (2) the extent to which it is known by employees and others involved in the business; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to the business and its competitors; (5) the amount of effort or money expended in developing the information; and (6) the ease or difficulty with which the information could be acquired or duplicated by others. *In re Bristol-Myers Co.*, 90 F.T.C. 455, 456-57 (1977). As discussed in the Dresden Declaration, the Confidential Documents relate to Dart's fees, its methodology for setting the fees, and its

³ FTC-PROD-0005277-79 is also marked as DART-0003-0004, and is identified by the FTC as part of CX3272 (with the date of 6/30/2016) (see above).

geographic scope of operations. Such information is both secret and material to Dart's business and, as set forth below, satisfies the standard for *in camera* treatment.

The Commission has recognized the propriety of granting *in camera* treatment to business records. *See, e.g., In re McWane, Inc.*, No. 9351, 2012 WL 3862131, at *2 (F.T.C. Aug. 17, 2012); *In re Champion Spark Plug Co.*, No. 9141, 1982 FTC LEXIS 85, at *2 (Apr. 5, 1982); *H.P. Hood & Sons, Inc.*, 58 F.T.C. at 1188-89; *In re Kaiser Aluminum & Chem. Corp.*, 103 F.T.C. 500, 500 (May 25, 1984). Thus, the information for which Dart seeks *in camera* treatment is eligible to receive it.

Dart has taken significant steps to protect the confidential information contained in the Confidential Documents, which was produced pursuant to compulsory processes and under the terms of the May 31, 2017, Protective Order Governing Confidential Material in this matter (the "Protective Order") that was issued to protect the information contained in the Confidential Documents at question here. Pursuant to the Protective Order, Dart's counsel designated the documents as "Confidential" to avoid any public disclosure. Furthermore, Dart takes substantial measures to guard the secrecy of the information contained in the Confidential Documents by limiting the dissemination of that information and taking every reasonable step to protect its confidentiality. The information contained in the Confidential Documents is only disclosed to Dart management and employees. As described in more detail in the Dresden Declaration, the information contained in the Confidential Documents relates to Dart's fees and the methodology for setting those fees is not and would not otherwise become publicly available.

Finally, Dart's status as a non-party is relevant to the treatment of its documents. The FTC has held that "[t]here can be no question that the confidential records of businesses involved in Commission proceedings should be protected insofar as possible." *H.P. Hood & Sons*, 58 F.T.C.

at 1186. This is especially so in the case of a non-party, which deserves “special solicitude” in its request for *in camera* treatment for its confidential business information. See *In re Kaiser Aluminum*, 103 F.T.C. at 500 (“As a policy matter, extensions of confidential or *in camera* treatment in appropriate cases involving third party bystanders encourages cooperation with future adjudicative discovery requests.”). Dart’s non-party status therefore weighs in favor of granting *in camera* status to the Confidential Documents.

III. IN CAMERA PROTECTION SHOULD EXTEND FOR FIVE YEARS

Because of the highly confidential and proprietary nature of the information contained in the Confidential Documents – competitively significant information that Dart continues to use and considers key to its business strategies, performance, and ongoing operations – lasting protection is appropriate in order to ensure avoidance of the competitive injuries to Dart’s business outlined above. See *In re 1-800 Contacts*, 2017 FTC LEXIS 55, at *3, *8 (recognizing that *in camera* treatment is appropriate where the material remains “competitively sensitive.”). As the Commission has previously recognized, if such Confidential Documents, are disclosed, Dart will lose the advantages that it currently enjoys based on its efforts to maintain the confidentiality of the information contained in the Confidential Documents. *In re Otto Bock Healthcare N. Am., Inc.*, No. 9378, 2018 FTC LEXIS 111, at *11 (July 6, 2018) (granting *in camera* treatment for five years from time of order to non-party’s ordinary course business documents, including documents containing product level sales data and pricing information); *In re 1-800 Contacts*, 2017 FTC LEXIS 55, *2-3. Therefore, and in recognizing the presumption of a public trial in this proceeding, Dart respectfully requests that the information contained in the Confidential Documents be afforded narrow *in camera* protection limited to a period of five years.

IV. Conclusion

For the reasons set forth above and in the accompanying Dresden Declaration, Dart respectfully requests that this Court grant *in camera* treatment for five years for the information contained in the Confidential Documents.

Respectfully submitted,

/s Adam J. Biegel

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Hilla.Shimshoni@alston.com

*Counsel for Non-Party
Dart Appraisal*

DATED: March 12, 2021

STATEMENT REGARDING MEET AND CONFER

The undersigned certifies that counsel for non-party Dart Appraisal (“Dart”) notified counsel for the parties via telephone on or about July 25, 2019, and via email on or about March 11, 2021, that it would be seeking *in camera* treatment of the Confidential Documents. Both counsel for the Federal Trade Commission and counsel for Respondent Louisiana Real Estate Appraisers Board indicated that they did not intend to oppose Dart’s motion.

Respectfully submitted,

/s Adam J. Biegel

Adam J. Biegel
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Adam.Biegel@alston.com
Hilla.Shimshoni@alston.com

*Counsel for Non-Party
Dart Appraisal*

DATED: March 12, 2021

EXHIBIT A

PUBLIC



Bureau of Competition
Anticompetitive Practices Division

UNITED STATES OF AMERICA
Federal Trade Commission
WASHINGTON, D.C. 20580

June 20, 2019

Via E-Mail

Dart Appraisal
c/o Adam Biegel, Esq.
adam.biegel@alston.com

RE: *In re Louisiana Real Estate Appraisers Board*, FTC Dkt. No. 9374

Dear Mr. Biegel:

By this letter we are providing formal notice, pursuant to Rule 3.45(b) of the Commission's Rules of Practice, 16 C.F.R. § 3.45(b), that Complaint Counsel intend to offer the documents and testimony referenced in the enclosed Attachment A into evidence in the administrative trial in the above-captioned matter. The administrative trial is currently scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless *in camera* status is granted by Administrative Law Judge D. Michael Chappell.

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

Motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45 and explained in *In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk*, 2015 FTC LEXIS (Feb. 23, 2015); and *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). You must also provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

Under the operative Fourth Revised Scheduling Order, your deadline for filing motions seeking *in camera* treatment is **August 2, 2019**.

If you have any questions, please feel free to contact me at (202) 326-2435

Sincerely,

/s/ Nathaniel Hopkin

Nathaniel M. Hopkin

Counsel Supporting the Complaint

Attachment A

PUBLIC
Confidential Notice
Attachment A

Exhibit No.	Description	Date	Bates - Begin	Bates - End
CX3272	Email from Hilla Shimshoni to Lisa Kopchik, Christine Kennedy, Adam Biegel, et al. re: Civil Investigative Demand issues to Dart Appraisal in the Matter of Louisiana Real Estate Appraisal Board, FTC File No. 161-0068 w/Attach: DART cover letter and cert	7/1/2016	FTC-PROD-0005264	FTC-PROD-0005269
	Spreadsheet: Dart's CID Response (Spec. 1)	6/30/2016	DART-0001	DART-0001
	Spreadsheet: Dart's CID Response (Spec. 2)	6/30/2016	DART-0002	DART-0002
	Document: Dart's CID Response (Specs. 3-4)	6/30/2016	DART-0003	DART-0004

EXHIBIT B

CONSTANTINE CANNON LLP

James J. Kovacs

Attorney

202-204-3518

jkovacs@constantinecannon.com

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

June 20, 2019

Via E-Mail and Mail

Adam J. Biegel

Alston & Bird

The Atlantic Building

950 F Street, NW

Washington, D.C. 20004-1404

Re: *In the Matter of Louisiana Real Estate Appraisers Board*, FTC Dkt. 9374

Dear Mr. Biegel,

This letter will constitute notice to your client Dart Appraisal, pursuant to 16 C.F.R. § 3.45(b) and paragraph 7 of the July 6, 2017 Scheduling Order in the above-captioned matter, that Respondent Louisiana Real Estate Appraisers Board (“LREAB”) intends to use the materials referenced on the attached Exhibit A as evidence at the administrative trial scheduled to begin on September 17, 2019. All exhibits admitted into evidence become part of the public record unless *in camera* treatment is granted by Administrative Law Judge D. Michael Chappell.

Pursuant to 16 C.F.R. § 3.45, for documents or testimony that you believe include sensitive or confidential information that you do not want on the public record, you must file a motion for *in camera* status with Judge Chappell. As indicated in paragraph 7 of the July 6, 2017 Scheduling Order, motions for *in camera* treatment for evidence to be introduced at trial must meet the strict standards set forth in 16 C.F.R. § 3.45, explained in *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re Jerk, LLC*, 2015 FTC LEXIS (Feb. 23, 2015); *In re Basic Research, Inc.*, 2006 FTC LEXIS 14 (Jan. 25, 2006). Motions also must be supported by a declaration or affidavit by a person qualified to explain the confidential nature of the documents. *In re I-800 Contacts, Inc.*, 2017 FTC LEXIS 55 (April 4, 2017); *In re North Texas Specialty Physicians*, 2004 FTC LEXIS 66 (April 23, 2004). Each party or non-party that files a motion for *in camera* treatment shall provide one copy of the documents for which *in camera* treatment is sought to the Administrative Law Judge.

CONSTANTINE CANNON LLP

WASHINGTON | NEW YORK | SAN FRANCISCO | LONDON

June 20, 2019

Page 2

Under the Fourth Revised Scheduling Order dated March 26, 2019, the deadline for filing motions seeking in camera status is **August 2, 2019**.

Please contact me via email or at (202) 204-3518 if you have any questions regarding the foregoing.

Best regards,

/s/ James J. Kovacs

James J. Kovacs

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June 20, 2019
Page 3

EXHIBIT A

CONSTANTINE CANNON LLP

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June 20, 2019

Page 4

Exhibit #	Description	Date	Beg Bates	End Bates
RX0571	Email from Hilla Shimshoni to Lisa Kopchik; Christine Kennedy; Adam Biegel; Nanci Weissgold re: Civil Investigative Demand issued to Dart Appraisal in the Matter of Louisiana Real Estate Appraisal Board, FTC File No. 161-0068	7/1/2016	FTC-PROD-0005264	FTC-PROD-0005269
RX0572	Dart Appraisal Customary and Reasonable Fee Process	7/1/2016	FTC-PROD-0005277	FTC-PROD-0005279
RX0573	Dart Appraisal CID data spreadsheet	7/1/2016	FTC-PROD-0005275	FTC-PROD-0005275
RX0571	Email from Hilla Shimshoni to Lisa Kopchik; Christine Kennedy; Adam Biegel; Nanci Weissgold re: Civil Investigative Demand issued to Dart Appraisal in the Matter of Louisiana Real Estate Appraisal Board, FTC File No. 161-0068	7/1/2016	FTC-PROD-0005264	FTC-PROD-0005269
RX0572	Dart Appraisal Customary and Reasonable Fee Process	7/1/2016	FTC-PROD-0005277	FTC-PROD-0005279
RX0573	Dart Appraisal CID data spreadsheet	7/1/2016	FTC-PROD-0005275	FTC-PROD-0005275

EXHIBIT C

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

In the Matter of)	
)	
Louisiana Real Estate Appraisers Board,)	
)	DOCKET NO. 9374
Respondents)	
)	

**DECLARATION OF MICHAEL DRESDEN
IN SUPPORT OF NON-PARTY DART APPRAISAL'S
MOTION FOR *IN CAMERA* TREATMENT**

I, Michael Dresden, hereby declare as follows:

1. I am the President at Dart Appraisal ("Dart"). Dart Appraisal is a nationwide independent appraisal management company.

2. I make this declaration in support of non-party Dart's Motion for *in camera* treatment for certain documents (the "Motion").

3. I have personal knowledge of the matters stated herein and, if called upon to do so, could competently testify about them.

4. I did not draft or manage the drafting of the documents Dart produced in the above-captioned matter in response to the Civil Investigative Demand from the Federal Trade Commission ("FTC") and a subpoena from the Louisiana Real Estate Appraisers Board ("LREAB") but I have reviewed them and am familiar with them. Given my position at Dart, I am familiar with the type of information contained in the documents at issue and its competitive significance to Dart. Based on my review of the documents, my knowledge of Dart's business, and my familiarity with the confidentiality protection afforded this type of information by Dart, the

disclosure of these documents to the public and to competitors of Dart would cause serious, irreparable competitive injury to Dart.

5. The FTC has notified Dart that it intends to introduce four documents that Dart produced to the FTC and the LREAB into evidence at the administrative trial in this matter, and Respondent LREAB has notified Dart that it intends to introduce three of Dart’s documents into evidence at the administrative trial in this matter. As described in the Motion, Dart seeks *in camera* protection for the information related to Dart’s fees and the methodology for setting the fees contained in these documents which are listed below.

Exhibit No.	Document Title/Description	Date	Beginning Bates No.	Ending Bates No.
CX3272 ¹ RX0571	Email from Hilla Shimshoni to Lisa Kopchik, Christine Kennedy, Adam Biegel, et al. re: Civil Investigative Demand issues to Dart Appraisal in the Matter of Louisiana Real Estate	07/01/2016	FTC-PROD-0005264	FTC-PROD-0005269
	Spreadsheet: Dart’s CID Response (Spec. 2)	6/30/2016	DART-0002	DART-0002
CX3272 ² RX0573	Spreadsheet: Dart’s CID Response (Spec. 1) / Dart Appraisal CID Data spreadsheet	07/01/2016	FTC-PROD-0005275	FTC-PROD-0005275
CX3272 ³ RX0572	Document: Dart’s CID Response (Spec. 3-4) / Dart Appraisal Customary and Reasonable Fee Process	07/01/2016	FTC-PROD-0005277	FTC-PROD-0005279

¹ CX3272 also contains documents marked DART-0001-0004. With the exception of DART-0002, these additional documents are marked as separate exhibits by LREAB. DART-0002 is not identified as an exhibit by LREAB.

² FTC-PROD-0005275 is also marked as DART-0001, and is identified by the FTC as part of CX3272 (with the date of 6/30/2016).

³ FTC-PROD-0005277-79 is also marked as DART-0003-0004, and is identified by the FTC as part of CX3272 (with the date of 6/30/2016).

6. Publicly disclosing any of Dart's confidential financial and strategic information is not necessary in this proceeding and could be detrimental to Dart whose only involvement in this proceeding is as a non-party.

7. Dart has taken significant steps to protect the confidential information contained in the documents identified above. Dart takes substantial measures to guard the secrecy of this confidential information by limiting the dissemination of the information and taking every reasonable step to protect its confidentiality. The information is only disclosed to Dart management and employees as needed and appropriate. The information is not, and would not, otherwise become publicly available.

8. CX3272/RX0571, RX0572 and Document: Dart's CID Response (Spec. 3-4) contain Dart's confidential, written response to the FTC's Civil Investigative Demand. The response contains confidential information regarding Dart's methodology for setting the fees that Dart pays to appraisers. Disclosure of information regarding Dart's methodology for setting the fees could have a material impact on Dart's ability to conduct its business and its ability to compete. Disclosure of this information could also be used by Dart's competitors to analyze Dart's place in the market and its confidential business strategies, giving those competitors an unfair competitive advantage over Dart. Therefore, the information related to Dart's methodology for setting the fees that Dart pays to appraisers should be given *in camera* protection.

9. CX3272/RX0573 and Spreadsheet: Dart's CID Response (Specs 1-2) contain confidential information regarding the fees that Dart pays to appraisers pulled from a confidential database maintained by Dart. It would be very difficult, if not impossible, for anyone outside of Dart to recreate this information. Disclosure of information regarding the fees that Dart pays to appraisers could have a material impact on Dart's ability to conduct its business and its ability to

compete. Even though the fees are several years old, disclosure of this information could still be used by Dart's competitors to analyze Dart's current place in the market, the scope and details of its appraisal operations including detailed geographic footprint, and its confidential business strategies, giving those competitors an unfair competitive advantage over Dart. Therefore, the information related to the fees that Dart pays to appraisers should be given *in camera* protection.

10. Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.



Michael Dresden
President
Dart Appraisal

Signed this 11th day of March 2021.

EXHIBIT D

**DOCUMENTS MARKED CONFIDENTIAL
REDACTION IN THEIR ENTIRETY REQUESTED**

CERTIFICATE OF SERVICE

I, Hilla Shimshoni, declare under penalty of perjury that the following is true and correct.

On March 12, 2021, I caused to be served the following documents on the parties listed below by the manner indicated:

- Non-Party Dart Appraisal's Motion for *In Camera* Treatment, with accompanying Memorandum of Law and all Exhibits, and Statement Regarding Meet and Confer
- [Proposed] Order Granting *In Camera* Treatment

The Office of the Secretary (via FTC E-Filing System (public version) and email (non-public version))

April Tabor
Acting Secretary
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-172
Washington, DC 20580
ElectronicFilings@ftc.gov

The Office of the Administrative Law Judge (via FTC E-Filing System (public version) and email (non-public version))

The Honorable D, Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-106
Washington, DC 20580

Complaint Counsel for Federal Trade Commission (via FTC E-Filing System (public version) and email (non-public version))

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/s Hilla Shimshoni

CERTIFICATE FOR ELECTRONIC FILING

I, Hilla Shimshoni, certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by parties and adjudicator.

Dated: March 12, 2021.

/s Hilla Shimshoni

CX3272 RX0572	Document: Dart's CID Response (Spec. 3-4) / Dart Appraisal Customary and Reasonable Fee Process	07/01/2016	FTC-PROD- 0005277	FTC-PROD- 0005279
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ORDERED:

The Honorable D. Michael Chappell
Chief Administrative Law Judge

Date: