

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

In the Matter of)	
)	
TELEBRANDS CORP.,)	
a corporation,)	
)	
TV SAVINGS, LLC,))
a limited liability company, and)	
)	DOCKET NO. 9313
AJIT KHUBANI,)	
individually and as president of)	
Telebrands Corp. and sole member)	
of TV Savings, LLC.)	

TO: The Honorable Stephen J. McGuire
Chief Administrative Law Judge

JOINT MOTION TO AMEND THE SCHEDULING ORDER

Complaint counsel and respondents hereby respectfully request that the Scheduling Order, dated November 5, 2003, be amended to extend the deadline for filing motions for summary decision for one week, from March 16 to March 23. We also request that certain related deadlines be extended by one week, but we do not request any change in the date of May 4, 2004 that has been set for the hearing in this matter.¹ A proposed revised Scheduling Order is attached as Exhibit A.

The Parties have worked diligently and cooperatively to complete discovery in this matter on March 5, 2004, as provided by the Scheduling Order. The last deposition was taken on March 5. The process of synthesizing and following up on all the information from the depositions is time consuming, however, and we request more time to do so before preparing motions for summary decision. Motions for summary decision can expedite the resolution of the matter by narrowing the issues for trial, or eliminating the need for trial, and we believe the

¹ We request that the following deadlines be extended by one week: Deadline for complaint counsel to provide respondents' counsel with its final proposed witness and exhibit lists (from March 18 to March 25); deadline for respondents' counsel to provide complaint counsel with its final proposed witness and exhibit lists (from March 22 to March 29); deadline for notice to opposing party of intent to offer confidential material into evidence (from March 24 to March 31); deadline for responses to motions for summary decision (from March 29 to April 5); deadline for motions in limine and motions to strike (from April 5 to April 12).

interests of all Parties will be furthered by allowing an additional week for preparation of motions for summary decision. In addition, the Parties note that respondents have filed a motion to compel which, if granted, would result in the reopening on one deposition for a limited purpose. We also note that the Scheduling Order has not been previously modified.

For the reasons stated above, the Parties respectfully request the Court to amend the Scheduling Order accordingly and approve the Revised Scheduling Order.

Date: March 11, 2004

Respectfully submitted by:

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