UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSIO

FEDERAL TRADE COMMISSION
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OCT 1 5-2004
SECRETARY

COMMISSIONERS:

Deborah Platt Majoras, Chairman

Orson Swindle Thomas B. Leary Pamela Jones Harbour

Jon Leibowitz

In the Matter of	
) PUBLIC DOCUMENT
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.)
	_)

MOTION FOR EXTENSION OF TIME

Respondents Telebrands Corporation, TV Savings, LLC and Ajit Khubani ("Respondents") hereby move the Commission for an extension of time for the filing of various briefs in this matter. Complaint Counsel have authorized us to state that they have no objection to the granting of the relief requested in this motion.

The service of the Initial Decision in this matter has resulted in the initial Appeal Brief by Respondents being due on Monday, October 25, 2004. Because Complaint Counsel has also appealed in this matter, their Brief, which would include both their initial Appeal Brief and the Answering Brief, would currently be due on Wednesday, November 24, the day before Thanksgiving. Respondents' Reply Brief would be due on

Monday, December 6, 2004 and Respondents' Answering Brief would then be due on Monday, December 27, 2004 (because of the Christmas holiday). Complaint Counsel's Reply Brief would be due on Thursday, January 6, 2005 (again, excluding the New Year's holiday). Because of long-standing family commitments and travel plans, the proximity of the briefing schedule to the Thanksgiving, Christmas and New Years holidays would work substantial inconvenience and hardship on some of the counsel involved in this matter.

Consequently, Respondents respectfully request that the following revised schedule be ordered for briefs in this matter:

Respondents' Initial Brief
Complaint Counsel's Answering Brief
and Appeal Brief
Respondents' Reply Brief
Respondents' Answering Brief
Complaint Counsel's Reply Brief

November 3, 2004

December 7, 2004 December 16, 2004 January 6, 2005 January 18, 2005

In summary, the last brief, under the proposed schedule, would be filed only approximately two weeks after the last brief would be filed under the existing schedule.

Respectfully submitted,

Edward F. Glynn, Jr.
Theodore W. Atkinson

Theodore W. Atkinson

VENABLE LLP 575 7th Street, N.W.

Washington, DC 20004-1601

(202) 344-8000

Attorneys for Respondents Telebrands Corp., TV Savings, LLC, and Ajit Khubani

Dated: October 15, 2004

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2004, pursuant to Federal Trade Commission Rules of Practice 4.2(c) and 4.4(b), I caused the foregoing RESPONDENTS' MOTION FOR EXTENSION OF TIME and [proposed] ORDER to be filed and served as follows:

(1) an original and twelve (12) paper copies filed by hand delivery and an electronic copy in Microsoft Word format filed by e-mail to:

Donald S. Clark, Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Rm. H-159
Washington, D.C. 20580
E-mail: secretary@ftc.gov

(2) one (1) paper copy served by hand delivery and e-mail to:

The Honorable Stephen J. McGuire Chief Administrative Law Judge 600 Pennsylvania Avenue, N.W. Rm. H-112 Washington, D.C. 20580

Constance M. Vecellio, Esquire Senior Counsel 601 New Jersey Ave., N.W. NJ-2115 Washington, D.C. 20580 cvecellio@ftc.gov

(3) by e-mail to:

James Reilly Dolan Assistant Director Federal Trade Commission 601 New Jersey Avenue, N.W. Washington, D.C. 20580 jdolan@ftc.gov I further certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original, and that a paper copy with an original signature is being filed with the Secretary of the Commission on the same day by other means.

Edward F. Glynn, Jr.

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS:	Deborah Platt Majoras, Cl Orson Swindle Thomas B. Leary Pamela Jones Harbour Jon Leibowitz	nairmar	1
In the Matter of			
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TELEBRANDS CO)	
a corporation	,)	
TV SAVINGS, LLC)	
•	llity company, and)	Docket No. 9313
	JJ)	
AJIT KHUBANI,)	
individually a	nd as president of)	
	orp. and sole member)	
of TV Saving	s, LLC.)	
		_)	
	ORD	ER	
Upon motion by	y Respondents for an Order	extend	ing the briefing schedule in this matter,
and with no opposition	having been interposed by	Compl	aint Counsel, it is hereby
ORDERED that the bri	efing schedule in this matte	r shall	be as follows:
Respondents' Ir	nitial Brief	November 3, 2004	
	nsel's Answering Brief	2.0.0	
	eal Brief	December 7, 2004	
Respondents' R	- ·	December 16, 2004	
Respondents' A	•	January 6, 2005 January 18, 2005	
Complaint Coul	nsel's Reply Brief	Janua	ary 18, 2003
By direction of the Cor	nmission.		
		14 C C	lark Secretary
	Liona	1/1 > 1	TALK SECTEDALY

Dated: October _____, 2004