

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

**COMMISSIONERS:**           **Deborah Platt Majoras, Chairman**  
   **Orson Swindle**  
   **Thomas B. Leary**  
   **Pamela Jones Harbour**  
   **Jon Leibowitz**

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In the Matter of	)	
	)	
NORTH TEXAS	)	Docket No. 9312
SPECIALTY PHYSICIANS,	)	
	)	
a corporation.	)	
	)	

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**ORDER DENYING MOTION FOR EXTENSION  
OF WORD COUNT LIMITS**

Respondent has moved that the Commission grant an extension of the word count limits set by Commission Rule of Practice 3.52, 16 C.F.R. § 3.52 (2004). Respondent argues that because of

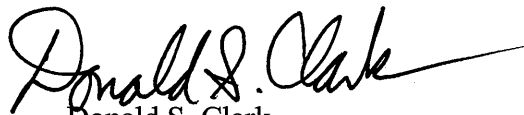
the volume of the record in this matter, the length of the Initial Decision, and the number of issues involved in the appeal and cross-appeal, . . . undue prejudice would result to the parties from complying with the word limits established in the rules for standard cases . . . [and] an extension of the word count limits will benefit the Commission in its consideration of the vast factual record and numerous legal issues before it.

Respondent’s Motion for Extension of Word Count Limits at 1-2. Respondent advises that Complaint Counsel have authorized it to state that they join in the relief requested in this motion. *Id.* at 2.

The Commission has determined to deny Respondent’s motion. The word limits prescribed by the Commission Rules of Practice should afford parties to FTC proceedings sufficient space to file pleadings and briefs of sufficient quality and detail to aid in the preparation of Commission opinions and orders. Indeed, Commission Rule 3.52(k), 16 C.F.R. § 3.52(k), expressly provides that “[e]xtensions of word count limitation are disfavored, and will only be granted where a party can make a strong showing that undue prejudice would result from complying with the existing limit.” The Commission has determined that Respondent has not made such a showing in this case. Accordingly,

**IT IS ORDERED THAT** Respondent's Motion for Extension of Word Count Limits be, and it hereby is, **DENIED**.

By the Commission.

A handwritten signature in black ink, appearing to read "Donald S. Clark", with a long horizontal flourish extending to the right.

Donald S. Clark  
Secretary

ISSUED: December 21, 2004