

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	Case No. 03-C-3904
)	
v.)	Hon. Robert W. Gettleman
)	
KEVIN TRUDEAU,)	
)	
Defendant,)	
)	
WINSTON & STRAWN LLP,)	
)	
Respondent,)	
)	
THE LAW OFFICES OF MARC LANE, PC,)	
)	
Respondent,)	
)	
WEBSITE SOLUTIONS USA, INC.,)	
)	
Respondent.)	
)	

**MOTION TO COMPEL WINSTON & STRAWN, THE LAW OFFICES OF MARC
LANE, AND WEBSITE SOLUTIONS USA TO COMPLY WITH SUBPOENAS**

MOTION TO COMPEL WINSTON & STRAWN, THE LAW OFFICES OF MARC LANE, AND WEBSITE SOLUTIONS USA TO COMPLY WITH SUBPOENAS

Pursuant to Federal Rules 45 and 69, and Paragraph XVI of the Stipulated Final Order (Sept. 3, 2004) (DE56), Plaintiff FTC moves to compel Winston & Strawn (“W&S”), the Law Offices of Marc Lane (“Lane”), and Trudeau-affiliated entity Website Solutions USA (“WSU”) to comply with subpoenas seeking information relevant to the FTC’s pending motion to hold Defendant Kevin Trudeau (“Trudeau”) in contempt. Specifically, the FTC asks the Court to order Winston & Strawn, Lane, and WSU to comply with the FTC’s document requests within three business days, and that WSU produce a corporate designee no more than one week thereafter. The accompanying brief (and the exhibits thereto) support this Motion.

Dated: January 18, 2013

Respectfully Submitted,

David O’Toole (dotoole@ftc.gov)
Federal Trade Commission
55 West Monroe Street, Suite 1825
Chicago, Illinois 60603-5001
Phone: (312) 960-5601
Fax: (312) 960-5600

/s/ Jonathan Cohen
Michael Mora (mmora@ftc.gov)
Jonathan Cohen (jcohen2@ftc.gov)
Federal Trade Commission
600 Pennsylvania Ave., N.W. M-8102B
Washington, DC 20580
Phone: 202-326-3373; -2551
Fax: 202-326-2558

CERTIFICATE OF SERVICE

I, Jonathan Cohen, hereby certify that on January 18, 2013, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System, which will send notification of such filing to:

Kimball Richard Anderson
kanderson@winston.com

Thomas Lee Kirsch, II
tkirsch@winston.com

Katherine E. Crowell
kcrowell@winston.com

I further certify that, on January 18, 2013, I caused to be served true copies of the foregoing by Federal Express to:

Marc J. Lane
The Law Offices of Marc Lane, PC
180 North LaSalle Street
Chicago, IL 60601

Nataliya Babenko & Suneil Sant
c/o Website Solutions USA, Inc.
130 Quail Ridge Drive
Westmont, IL 60559

Michael Dow
c/o Mary Patricia Benz, Esq.
111 West Washington, Suite 1150
Chicago, IL 60602

/s/ Jonathan Cohen
Jonathan Cohen (jcohen2@ftc.gov)
Attorney for Plaintiff
Federal Trade Commission