

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|---------------------------|---|-------------------------------|
| FEDERAL TRADE COMMISSION, |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Civil Action No. 03-C-3904 |
| |) | |
| KEVIN TRUDEAU, |) | Honorable Robert W. Gettleman |
| Defendant. |) | |

**DEFENDANT KEVIN TRUDEAU’S MOTION TO STAY THIRD-PARTY DISCOVERY
AND APPOINT A SPECIAL MASTER FOR THE PURPOSE OF ESTABLISHING A
CONSUMER REMEDIATION PLAN**

Defendant Kevin Trudeau respectfully moves to stay third-party discovery relating to the FTC’s Motion to Hold Defendant Trudeau in Contempt for Violating the June 2, 2010 Order, Incarcerate Him, and Order Him to Provide an Accounting of and Turnover Assets (“Contempt Motion”), and requests that this Court appoint a Special Master at this time.

The reasons for this Motion are more fully set forth in Mr. Trudeau’s accompanying Memorandum.

Respectfully submitted,

KEVIN TRUDEAU

By: /s/ Kimball R. Anderson
One of His Attorneys

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CERTIFICATE OF SERVICE

I, Kimball R. Anderson, an attorney, hereby certify that on February 4, 2013, I caused to be served true copies of DEFENDANT KEVIN TRUDEAU'S MOTION TO STAY THIRD-PARTY DISCOVERY AND APPOINT A SPECIAL MASTER FOR THE PURPOSE OF ESTABLISHING A CONSUMER REMEDIATION PLAN, by filing such document through the Court's Electronic Case Filing System, which will send notification of such filing to:

Michael Mora
Sandhya P. Brown
Elizabeth Tucci
Laureen Kapin
Steven Dowdell
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Federal Trade Commission
601 New Jersey Avenue NW, Suite 2215
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/s/ Kimball R. Anderson
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