

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

FEDERAL TRADE COMMISSION,	)	
Plaintiff,	)	
	)	Case No. 03-C-3904
v.	)	
	)	Judge Gettleman
KEVIN TRUDEAU,	)	
Defendant.	)	
_____	)	

**NOTICE OF MOTION**

**TO:** Michael Mora  
Sandhya P. Brown  
Elizabeth Tucci  
Laureen Kapin  
Steven Dowdell  
Jonathan Cohen  
Federal Trade Commission  
601 New Jersey Ave, NW Suite 2215  
Washington, DC 20001

David O'Toole  
Federal Trade Commission  
55 West Monroe St., Suite 1825  
Chicago, IL 60603

PLEASE TAKE NOTICE that the undersigned will appear before the Honorable Robert W. Gettleman on Friday February 8, 2013 at 1:30 p.m. in Courtroom 1703 in the Federal Office Building, 219 South Dearborn Street, Chicago, Illinois, or before any judge sitting in his stead, and present **DEFENDANT KEVIN TRUDEAU'S MOTION TO STAY THIRD-PARTY DISCOVERY AND APPOINT A SPECIAL MASTER FOR THE PURPOSE OF ESTABLISHING A CONSUMER REMEDIATION PLAN**, a copy of which has been served upon you by the Court's electronic filing system.

Respectfully submitted,

By: /s/ Kimball R. Anderson

Kimball R. Anderson  
Winston & Strawn LLP  
35 West Wacker Drive  
Chicago, IL 60601  
Phone: 312-558-5600  
Facsimile: 312-558-5700

*Attorney for Kevin Trudeau*

**CERTIFICATE OF SERVICE**

I, Kimball R. Anderson, an attorney, hereby certify that on February 4, 2013 I caused to be served true copies of the above Notice of Motion 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  
Jonathan Cohen  
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/s/ Kimball R. Anderson  
Kimball R. Anderson  
Attorney for Kevin Trudeau