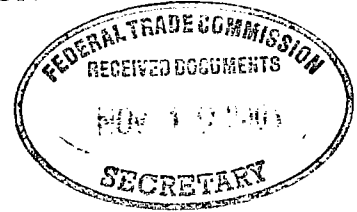


**COPY**

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



In the Matter of )  
 )  
 )  
 **KENTUCKY HOUSEHOLD** )  
 **GOODS CARRIERS** )  
 **ASSOCIATION, INC.,** )  
 )  
 **a corporation.** )  
 )

**Docket No. 9309**

**RESPONDENT'S FIRST DEMAND FOR  
PRODUCTION OF DOCUMENTS**

Pursuant to Section 3.37 of the Commission's Rules of Practice, Respondent Kentucky Household Goods Carriers Association, Inc. hereby requests that Complaint Counsel produce the following Documents within twenty (20) days after service hereof.

**DEFINITIONS**

The following definitions shall apply herein:

- A. "FTC," "Commission," "Complaint Counsel," "you," or "your" means the U.S. Federal Trade Commission, including its employees, agents, attorneys, consultants, representatives, officers, and all other persons acting on its behalf.
- B. "Complaint" means the Complaint in this proceeding.
- C. "Person" means ant natural person, firm, partnership, corporation, incorporated association, organization, joint venture, cooperative, governmental body, agency instrumentality, and/or subdivision, or other form of legal entity.

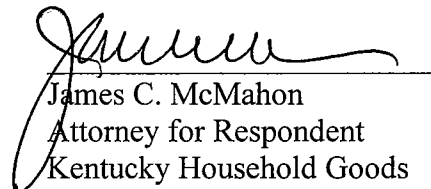
- D. "Kentucky Association" means Kentucky Household Goods Carriers Association, Inc, the Respondent in this proceeding.
- E. "Tariff" means KYDVR Tariff No. 5 and all Supplements thereto.
- F. "Mover" means a motor common carrier of household goods.

**DOCUMENTS**

- 1. Any and all documents in your possession or of which you are aware from which any response to any of the Interrogatories served herewith of even date may be ascertained or derived or which contain information which might in any way relate to such Interrogatories or responses.
- 2. Any and all documents which will be offered in evidence or referred to by you for any purpose upon the trial of this proceeding or any motion to be made herein.

Dated: New York, NY  
October 31, 2003

Respectfully submitted,

  
James C. McMahon  
Attorney for Respondent  
Kentucky Household Goods  
Carriers Association, Inc.  
60 East 42<sup>nd</sup> Street; Ste. 1540  
New York, NY 10165-1544  
212.973.4862

**CERTIFICATE OF SERVICE**

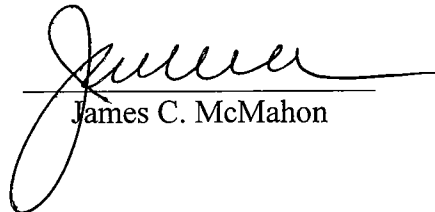
This is to certify that on November 17, 2003, I caused a copy of the attached **Respondent's First Demand for Production of Documents** to be served upon the following persons by U.S. Express Mail:

Hon. D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

Hon. Richard Dagen  
Associate Director  
Federal Trade Commission  
601 New Jersey Ave., N.W.  
Room 6223  
Washington, DC 20580

Dana Abrahamsen, Esq.  
Bureau of Competition  
Federal Trade Commission  
601 New Jersey Avenue, N.W.  
Washington, D.C. 20580

Dated: New York, NY  
November 17, 2003

  
James C. McMahon