



UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Jon Leibowitz, Chairman
Pamela Jones Harbour
William E. Kovacic
J. Thomas Rosch

In the Matter of

DOCKET NO. 9340

THE M GROUP, INC., also doing
business as BAMBOOSA, a corporation,
and

PUBLIC

MINDY JOHNSON, MICHAEL
MOORE, and MORRIS SAINTSING,
individually and as members of the
corporation.

**COMPLAINT COUNSEL'S OPPOSITION TO RESPONDENTS' MOTION TO
EXTEND RESPONDENTS' TIME TO RESPOND TO COMPLAINT**

Complaint Counsel respectfully opposes Respondents' motion for an additional twenty-one (21) days to file their Answer to the Complaint in this matter.

Respondents have not offered good cause for extending the time to respond to the Complaint. Respondents do not deny that they are ably represented by counsel; they simply state that they are seeking to retain additional counsel to assist in their representation. While Respondents are free to continue their efforts to retain additional counsel, such efforts do not justify a delay in this litigation. Moreover, although service was not effected on Respondents until August 14, 2009, counsel for Respondents received a courtesy copy of the Complaint on or about August 7, 2009. Thus, Respondents already have had more than fourteen (14) days to seek additional counsel and to prepare their Answer, and Respondents' motion for an extension of time to file should be denied.

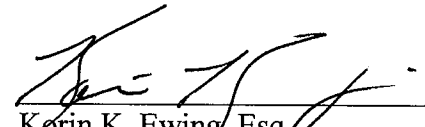
If the Court is inclined to grant an extension, Complaint Counsel requests that the time for Respondents to file their Answer be extended by not more than ten (10) days, making Respondents' Answer due no later than Tuesday, September 8, 2009. Respondents have offered

no reasonable basis for extending their time to file an Answer by an additional three weeks rather than by this shorter period. Respondents' only argument is that they do not want their response to be due during the shortened week following the Labor Day holiday, but neither Respondents nor their counsel have indicated that they would be unavailable during that week or offered any other grounds for being unable to file their answer that week. An extension of no more than ten days should allow Respondents sufficient time to prepare their Answer and to locate additional counsel.

Thus, Complaint Counsel respectfully requests that Respondents' Motion to Extend Respondents' Time to Respond to Complaint be denied or, in the alternative, that the time to respond be extended by no more than ten days, making Respondents' Answer due no later than Tuesday, September 8, 2009.

Respectfully Submitted,

Dated: August 26, 2009


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Complaint Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2009, I served an original and a true and correct electronic copy of the foregoing upon

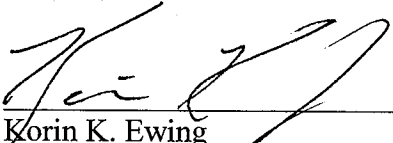
Donald S. Clark
Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW, H-135
Washington, DC 20580

I hereby certify that on August 26, 2009, I served a true and correct copy of the foregoing upon

The Hon. D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, NW, H-106
Washington, DC 20580
oalj@ftc.gov

I hereby certify that on August 26, 2009, I served via electronic mail a true and correct copy of the foregoing upon

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