UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SIMPLE HEALTH PLANS LLC, et al.,

Defendants.

Case No.: 18-cv-62593-DPG

DEFENDANT STEVEN DORFMAN'S PROPOSED PRELIMINARY INJUNCTION BRIEFING AND HEARING SCHEDULE

Defendant, Steven Dorfman, pursuant to the Court's order entered on February 5, 2019 [D.E. 71], through undersigned counsel, files this notice of proposed preliminary injunction hearing and briefing schedule with proposed orders annexed hereto as **Exhibit "A."** The parties were unable to agree on proposed dates, and therefore, Mr. Dorfman's suggested dates are as follows:

Scenario 1

Preliminary Injunction Hearing: April 16, 2019

Mr. Dorfman's Opposition to Entry of a Preliminary Injunction: March 25, 2019

FTC's Reply in Support of Entry of a Preliminary Injunction: April 8, 2019

Motion(s) for Live Testimony: April 8, 2019

Opposition(s) to Motion(s) for Live Testimony: April 11, 2019

Scenario 2

Preliminary Injunction Hearing: April 16, 2019

Mr. Dorfman's Opposition to Entry of a Preliminary Injunction: April 9, 2019

FTC's Reply in Support of Entry of a Preliminary Injunction: April 15, 2019

Motion(s) for Live Testimony: April 8, 2019

Opposition(s) to Motion(s) for Live Testimony: April 11, 2019

Dated: February 8, 2019

Respectfully Submitted,

DLA Piper LLP (US)

/s/ Ryan D. O'Quinn Ryan D. O'Quinn (FBN 0513857) ryan.oquinn@dlapiper.com Elan A. Gershoni (FBN 95969) elan.gershoni@dlapiper.com 200 South Biscayne Boulevard Suite 2500 Miami, Florida 33131

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served this 8th day of February, 2019, by the Notice of Electronic Filing, and was electronically filed with the Clerk of the Court via the CM/ECF system, which generates a notice of the filing to all attorneys of record.

/s/ Ryan D. O'Quinn Ryan D. O'Quinn