

would assist the Court, particularly with regard to any issues regarding what corporate entities any proposed remedy would reach.

Counsel for the Defendant has conferred with counsel for the Commission, who reports the Commission opposes this motion.

Dated: October 10, 2023

Respectfully submitted,

By: /s/ Michael J. Edney

Michael J. Edney

Virginia Bar No. 48253

DC Bar No. 492024 (*admitted to N.D. Tex.*)

medney@huntonak.com

HUNTON ANDREWS KURTH LLP

2200 Pennsylvania Avenue NW

Washington, DC 20037

Phone: (202) 955-1500

Facsimile: (202) 778-2201

COUNSEL FOR TIMOTHY LYNCH BARTON

CERTIFICATE OF SERVICE

On October 10, 2023, I electronically submitted the foregoing document with the clerk of court for the United States District Court for the Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/Michael J. Edney

Michael J. Edney