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 8 FEDERAL TRADE COMMISSION

9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **OAKLAND DIVISION**

12 FEDERAL TRADE COMMISSION,
 13 Plaintiff,
 14 v.
 15 PRECISION PATIENT OUTCOMES, INC.,
 16 a corporation; and
 17 MARGRETT PRIEST LEWIS,
 18 individually and as CEO of Precision
 Patient Outcomes, Inc.,
 19 Defendants.

Case No. 4:22-cv-7307-HSG

**STIPULATION AND
 ORDER REGARDING
 EVIDENCE OF
 DEFENDANTS' WEBSITES
 AND SOCIAL MEDIA
 ACCOUNTS FOR
 DEPOSITIONS, SUMMARY
 JUDGMENT, TRIAL AND
 OTHER PROCEEDINGS**

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1 Pursuant to Civil Local Rule 7-12, Plaintiff Federal Trade Commission
2 (“FTC”) and Defendants Precision Patient Outcomes, Inc. (“PPO”) and Margrett Priest Lewis
3 (“Lewis”)¹ (collectively, the “Parties”) by and through their counsel hereby stipulate as follows:

4 **RECITALS**

5 WHEREAS, the Parties wish to enter into this stipulation to avoid disputes as to the
6 authenticity and admissibility of certain documents to promote the orderly and efficient
7 introduction of evidence for purposes of depositions, summary judgment, trial, and other
8 proceedings in this matter.

9 WHEREAS, the Parties also wish to enter into this stipulation to help limit potential
10 discovery disputes and discovery motions practice.

11 **STIPULATION**

12 THEREFORE, THE PARTIES HEREBY STIPULATE and request for the Court to enter
13 an order as follows:

14 1. For purposes of all proceedings in this matter, Defendants stipulate to the
15 authenticity and admissibility of the following documents:

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FAC Exhibit	Bates No.	Description
3	FTCPPO-0010911, FTCPPO-0017923	Screen capture of ppolab.com’s product page for Virus Resist (captured Sept. 28, 2021)
4	FTCPPO-0008104	Screen capture of May 3, 2021 Facebook post by PPO (captured July 12, 2021)
5	FTCPPO-0010950 – FTCPPO-0017091	Screen capture of ppo-health.com’s “Cart” page (captured Oct. 4, 2021)
6	FTCPPO-0010950 – FTCPPO-0017091	Screen capture of ppo-health.com’s home page (captured Oct. 4, 2021)

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¹ Defendants PPO and Lewis are collectively referred to herein as the “Defendants”.

FAC Exhibit	Bates No.	Description
7	FTCPPO-0010950 – FTCPPO-0017091	Screen capture of ppo-health.com’s “About Us” page (captured Oct. 4, 2021)
8	FTCPPO-0010950 – FTCPPO-0017091	Screen capture of ppo-health.com’s “Our Research” page (captured Oct. 4, 2021)
9	FTCPPO-0017092 – FTCPPO-0017906	Screen capture of ppolab.com’s product page for Virus Resist (captured Oct. 4, 2021)
10	FTCPPO-0017092 – FTCPPO-0017906	Screen capture of ppolab.com’s product page for Virus Resist (captured Oct. 4, 2021)
11	FTCPPO-0017092 – FTCPPO-0017906	Screen capture of ppolab.com’s product page for Virus Resist (captured Oct. 4, 2021)
12	FTCPPO-0017092 – FTCPPO-0017906	Screen capture of ppolab.com’s home page (captured Oct. 4, 2021)
13	FTCPPO-0019888	Screen capture of PPO’s Facebook cover page (captured Jan. 7, 2022)
14	FTCPPO-0008106, FTCPPO-0008128	Screen capture of May 4, 2021 Facebook post by PPO (captured Jan. 7, 2022)
15	Capture – FTCPPO-0008129 Video – FTCPPO-0001006	Screen capture and video of Aug. 27, 2021 Facebook post by PPO (captured Jan. 10, 2022)
16	Capture – FTCPPO-0008130 Video – FTCPPO-0008122	Screen capture and video of Aug. 27, 2021 Facebook post by PPO (captured Jan. 19, 2022)

FAC Exhibit	Bates No.	Description
17	FTCPPO-0019889	Screen capture of Nov. 9, 2021 Instagram post by PPO (captured Jan. 10, 2022)
18	FTCPPO-0019890	Screen capture of Nov. 9, 2021 Instagram post by PPO (captured Jan. 10, 2022)
Discovery Production		
Bates No.		Description
FTCPPO-0008131		Screen capture of Nov. 12, 2021 Facebook post by PPO (captured Jan. 19, 2022)
FTCPPO-0008114		Screen capture of PPO's Instagram main page (captured July 12, 2021)
FTCPPO-0010940		Screen capture of COVID Resist post on Lewis's personal Facebook page (captured July 12, 2021)
FTCPPO-0008123		Screen capture of ppolab.com's "Meet Our Team" page (captured Feb. 15, 2022)
FTCPPO-0010874		Screen capture of ppolab.com's product page for VIRUS Resist (captured Sept. 28, 2021)
FTCPPO-0008126		Screen capture of ppolab.com's product page for VIRUS Resist (captured Feb. 15, 2022)

2. Defendants admit that the documents identified in the tables in paragraph 1 above reflect true and correct captures of their websites and/or social media, including video captures, and stipulate to the accuracy of descriptions of the documents provided above, including the dates of capture.

3. Defendants shall not object to the authenticity or admissibility of the documents identified in paragraph 1 above during depositions, motions practice, trial, or any other proceeding in this matter.

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MARGRETT PRIEST LEWIS

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 Dated: 11/14/2023

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5 HONORABLE HAYWOOD S. GILLIAM, JR.
6 UNITED STATES DISTRICT JUDGE
7 NORTHERN DISTRICT OF CALIFORNIA

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