

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES



_____)
In the Matter of)
)
LabMD, Inc.,)
 a corporation,)
 Respondent.)
)
_____)

PUBLIC

Docket No. 9357

ORIGINAL

JOINT STIPULATIONS ON ADMISSIBILITY OF EXHIBITS

1. The parties hereby stipulate and agree that the Joint Exhibits listed hereto in Attachment A are admitted without objection.
2. The parties hereby stipulate and agree that all exhibits that are listed in each party's Exhibit List not appearing in Attachment A may be conditionally admitted to the record. The parties reserve all objections previously asserted to these materials, including objections to designated and counter-designated testimony in transcript exhibits. Complaint Counsel has separately submitted its objections to Respondent's designated and counter-designated testimony. If such materials are relied upon in post-trial briefing of findings of fact or conclusions of law, any party may re-assert an objection to such material at that stage of the proceeding. The objection may be made in reply briefs or in any appropriate form. If such material is used during the Hearing for any reason, a party may elect to seek a ruling on an objection at that time or defer asserting the objection until post-trial briefing and such objections are not waived if not asserted during the Hearing. The parties further stipulate that any evidentiary material not identified in post-

trial briefing shall not be considered part of the record in this proceeding, i.e. not admitted into evidence.

3. The parties also stipulate and agree that a document need not be admissible to be used solely to impeach.

Dated: May 14, 2014

Respectfully submitted,

*William Sherman / with permission
JAB*

John

Reed Rubinstein
William A. Sherman, II
Sunni Harris
Dinsmore & Shohl, LLP
801 Pennsylvania Avenue, NW, Suite 610
Washington, DC 20004
reed.rubinstein@dinsmore.com
william.sherman@dinsmore.com
sunni.harris@dinsmore.com

Alain Sheer
Laura Riposo VanDruff
Megan Cox
Margaret Lassack
Ryan Mehm
John Krebs
Jarad Brown

Michael Pepson
Lorinda Harris
Hallee Morgan
Robyn Burrows
Kent Huntington
Daniel Epstein
Patrick Massari
Cause of Action
1919 Pennsylvania Avenue, NW, Suite 650
Washington, DC 20006
michael.pepson@causeofaction.org
lorinda.harris@causeofaction.org
hallee.morgan@causeofaction.org
robyn.burrows@causeofaction.org
kent.huntington@causeofaction.org
daniel.epstein@causeofaction.org
patrick.massari@causeofaction.org

Federal Trade Commission
600 Pennsylvania Ave., NW
Room NJ-8100
Washington, DC 20580
Telephone: (202) 326-2927 – Brown
Facsimile: (202) 326-3062
Electronic mail: jbrown4@ftc.gov

Complaint Counsel

Counsel for Respondent LabMD, Inc.

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
Category 1: Exhibits Appearing on both Respondent's and Complaint Counsel's Exhibit Lists to which Neither Party Objects					
RX1	6/1/07 Day Sheet Transaction	LabMD IH Ex. 7 - Checks and LabMD Day Sheets, redacted	6/1/2007	FTC-000169	FTC-000224
CX0687	Details				
RX6	Sentinel Network Complaint	Consumer Sentinel Complaint by Peter Cuitino		FTC-000661	FTC-000675
CX0402					
RX7		Letter J. Hayes to R. Yodaiken attaching LabMD Breach Notice Letter	4/10/2013	FTC-000680	FTC-000684
CX0441	FTC envelop scan	Providyn Authorization to Perform External Network Testing	5/18/2010	FTC-PVD-000001	FTC-PVD-000001
RX8	Letter from Mike Daugherty to Providyn, Inc.				
CX0491		Providyn Service Solutions Proposal for LabMD, unexecuted	2010	FTC-PVD-000015	FTC-PVD-000017
RX9	Service Solutions Proposal for LabMD from Providyn, Inc.				
CX0047		CX0042 (including all of RX10-12): Email H. Davidson to M. Daugherty	5/18/2010	FTC-PVD-000020	FTC-PVD-000022
RX10	Email from H. Davidson to M. Daugherty dated	Subject RE: Providyn Follow Up, attaching LabMD External Vulnerability Scan.pdf and Auth. To Perform External Network Scan.doc	7/2/1905	FTC-PVD-000023	FTC-PVD-000026
CX0042	Service Solutions Proposal for LabMD from Providyn, Inc.				
RX11	Letter from Mike Daugherty to Providyn, Inc.		5/18/2010	FTC-PVD-000027	FTC-PVD-000027
CX0042	Invoice to LabMD from Providyn, Inc.	Providyn Invoice 2172	5/25/2010	FTC-PVD-000038	FTC-PVD-000038
RX12	Invoice to LabMD from Providyn, Inc.	Providyn Invoice 2236	7/19/2010	FTC-PVD-000039	FTC-PVD-000039
CX0048					
RX13	Invoice to LabMD from Providyn, Inc.	Providyn Invoice 2300	9/6/2010	FTC-PVD-000040	FTC-PVD-000040
CX0049		Providyn Service Solutions Proposal for LabMD, executed by M. Daugherty	5/28/2010	FTC-PVD-000049	FTC-PVD-000053
RX14	Service Solutions Proposal for LabMD from Providyn	Providyn Network Security Scan - Demographics	7/18/2010	FTC-PVD-000094	FTC-PVD-000120
RX15	Full Report Analysis	Providyn Network Security Scan - Firewall	9/3/2010	FTC-PVD-000241	FTC-PVD-000265
CX0050					
RX16	Full Report Analysis	Providyn Network Security Scan - Mail	9/3/2010	FTC-PVD-000315	FTC-PVD-000387
CX0051	Service Solutions Proposal for LabMD from Providyn	Providyn Network Security Scan - Mapper	9/3/2010	FTC-PVD-000416	FTC-PVD-000442
RX17	Full Report Analysis	Providyn Network Security Scan - Demographics	9/3/2010	FTC-PVD-000443	FTC-PVD-000466
CX0052					
RX18	Full Report Analysis				
CX0053					
RX19	Full Report Analysis				
CX0054					
RX20	Full Report Analysis				
CX0055					
RX21	Full Report Analysis				
CX0056					
RX22	Full Report Analysis				
CX0057					
RX23	Full Report Analysis				
CX0058					
RX24	Full Report Analysis				
CX0059					
RX25	Full Report Analysis				
CX0060					
RX26	Full Report Analysis				
CX0061					
RX27	Full Report Analysis				
CX0062					

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX28		Providyn Network Security Scan - Specialty VPN	9/3/2010	FTC-PVD-000467	FTC-PVD-000490
CX0063	Full Report Analysis	Providyn Network Security Scan - Network Printer	9/3/2010	FTC-PVD-000491	FTC-PVD-000514
RX29		Providyn Network Security Scan - LabCorp VPN	9/3/2010	FTC-PVD-000515	FTC-PVD-000539
CX0064	Full Report Analysis	Providyn Network Security Scan - Firewall	5/21/2010	FTC-PVD-000840	FTC-PVD-000864
RX30		Providyn Network Security Scan - Specialty VPN	5/21/2010	FTC-PVD-001138	FTC-PVD-001161
CX0065	Full Report Analysis	Providyn Network Security Scan - Network Printer	5/21/2010	FTC-PVD-001162	FTC-PVD-001185
RX37		Providyn Network Security Scan - LabCorp VPN	5/21/2010	FTC-PVD-001186	FTC-PVD-001210
CX0066	Full Report Analysis	Cypress C4 IP Services Order Form	1/9/2008	FTC-LABMD-000246	FTC-LABMD-000249
RX38		MDS Invoice	4/10/2009	FTC-LABMD-000255	FTC-LABMD-000255
CX0072	Full Report Analysis	Mail Batch Instructions		FTC-LABMD-000312	FTC-LABMD-000313
RX39		Daily Credit Card Transactions		FTC-LABMD-000339	FTC-LABMD-000339
CX0073	Full Report Analysis	New Team Member Checklist		FTC-LABMD-000366	FTC-LABMD-000366
RX40		Process for Working Aging Reports		FTC-LABMD-000377	FTC-LABMD-000377
CX0074	Full Report Analysis	Staff Info		FTC-LABMD-000403	FTC-LABMD-000403
RX45		Monthly Status of Pending Tasks (1/2007)	2/5/2007	FTC-LABMD-000460	FTC-LABMD-000462
CX0253	Cyprus Communications Services Order	LabMD Clients with Remote Access		FTC-LABMD-000567	FTC-LABMD-000567
RX46		LabMD Insurance Aging Report (Cover Page)	6/5/2007	FTC-LABMD-000718	FTC-LABMD-000718
CX0264	Managed Data Solutions Invoice	Insurance Aging Report - Page 1 Excerpt	6/5/2007	FTC-LABMD-000777	FTC-LABMD-002494
RX60					
CX0162	Mail Batch Instructions				
RX61	Daily Credit Card Transactions Form				
CX0233	LabMD New Team Member Checklist				
RX62					
CX0003	Patient Aging Report				
RX63	LabMD Staff Responsibility breakdown				
CX0163	Jan 2007 Monthly Status of Pending Tasks Form				
RX65	List of clients with remote access to LabMD system				
CX0234	LabMD Insurance Aging Report				
RX66	LabMD Insurance Aging Report (1718 file)				

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX96					
CX0178	Server Ports and Firewall Mapper	Mapper - Server Ports & Firewall threat summary	6/18/2010	FTC-LABMD-002616	FTC-LABMD-002616
RX170					
CX0185	TrendMicro Daily Virus Report	Trend Micro Daily Virus Report	7/10/2010	FTC-LABMD-003084	FTC-LABMD-003088
RX172					
CX0006	LabMD Policy Manual	LabMD Policy Manual		FTC-LABMD-003141	FTC-LABMD-003162
RX173	LabMD IT Staff Walkaround Checklist				
CX0004		IT Walk Around Checklist	8/6/2007	FTC-LABMD-003164	FTC-LABMD-003164
RX182					
CX0236	LabMD email re: Daily IT Rounds	Email Subject: Daily IT rounds	8/22/2007	FTC-LABMD-003175	FTC-LABMD-003175
RX212					
CX0199	LabMd Email re: Daily IT Rounds	Email Subject: Daily IT rounds	11/21/2007	FTC-LABMD-003213	FTC-LABMD-003213
RX265	ZyXel Firewall Rules Storage Space in Use	ZyXEL Firewall Rules		FTC-LABMD-003268	FTC-LABMD-003268
RX266	LabMD Server Room Security Chart - Jun 2010	Server Updates (incl. Sales Reports)	6/11/2010	FTC-LABMD-003274	FTC-LABMD-003274
CX0126	LabMD Server Room Security Chart - Jul 2010	Server Updates (incl. Sales Reports)	7/5/2010	FTC-LABMD-003275	FTC-LABMD-003275
RX268					
CX0268	Malware Quickscan Log	mbam log	7/15/2010	FTC-LABMD-003284	FTC-LABMD-003286
RX269					
CX0818	Malware Quickscan Log	mbam log (14-12-36)	7/15/2010	FTC-LABMD-003293	FTC-LABMD-003293
RX271		Microsoft Windows App Firewall Bypass		FTC-LABMD-003316	FTC-LABMD-003317
CX0825	Security scan results	Microsoft Windows App Firewall Bypass - Windows Security Center AntiVirus Override		FTC-LABMD-003343	FTC-LABMD-003343
RX272		IT Tools/Checks-handwritten - Administrators Old Computer		FTC-LABMD-003344	FTC-LABMD-003344
CX0830	Security Scan Results	Virus/Malware Results - July 2010	7/30/2010	FTC-LABMD-003350	FTC-LABMD-003358
RX273					
CX0169	Product Key Chart	mbam logs-Mapper		FTC-LABMD-003428	FTC-LABMD-003428
RX274					
CX0193	July 2010 Security Scan List	mbam logs-Mapper		FTC-LABMD-003438	FTC-LABMD-003438
RX288					
CX0832	Malware Quickscan Log				
RX298					
CX0832	Malware Quickscan Log				

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX304					
CX0833	Malware Quickscan Log	mbam logs-Visnetic	7/31/2010	FTC-LABMD-003444	FTC-LABMD-003444
RX306	Automated PC Technologies New				
CX0395	Service Agreement	New APT service agreement	2/23/2006	FTC-LABMD-003471	FTC-LABMD-003474
RX307					
CX0035	APT Service Invoice	Automated PC Technologies, Inc. ("APT") Service Invoice		FTC-LABMD-003475	FTC-LABMD-003482
RX308					
CX0203	Christopher Maire resume	Christopher Maire Resume		FTC-LABMD-003488	FTC-LABMD-003489
RX309					
CX0005	LabMD Compliance Program	LabMD Compliance Program effective Jan. 2003	Jan-03	FTC-LABMD-003493	FTC-LABMD-003502
RX310	LabMD Compliance Training	Compliance Training PowerPoint			
CX0127	Powerpoint	Slides		FTC-LABMD-003503	FTC-LABMD-003530
RX312	Email between Sandra Brown and	Email S. Brown to J. Boyle Subject:	8/12/2010	FTC-LABMD-003587	FTC-LABMD-003587
CX0170	John Boyle re: Limewire issues	Limewire Issue			
RX316	Pathology Records and Materials	Pathology Records and Materials			
CX0834	Retention	Retention	May-09	FTC-LABMD-003635	FTC-LABMD-003635
RX317	Managed Data Solutions Security	Managed Data Solutions ("MDS")			
CX0046	Scan Summary	Statement of Work for LabMD re: penetration testing		FTC-LABMD-003636	FTC-LABMD-003645
RX318	LabMD connections map for Power	Network Diagram - Powers Ferry Road			
CX0039	Ferry Rd location- 2009	Location Apr. 2009	Apr-09	FTC-LABMD-003646	FTC-LABMD-003646
RX319	LabMD connections map for Power	Network Diagram - Powers Ferry Road			
CX0040	Ferry Rd location- 2010	Location Sept. 2010	Sep-10	FTC-LABMD-003647	FTC-LABMD-003647
RX320	LabMD connections map for Power	Network Diagram - Powers Ferry Road			
CX0041	Ferry Rd location- 2011	Location 2011		FTC-LABMD-003648	FTC-LABMD-003648
RX322					
CX0320	Brandon Bradley resume	Brandon Bradley Resume		FTC-LABMD-003657	FTC-LABMD-003658
RX325	Managed Data Solutions Project				
CX0194	Proposal	MDS Project Proposal - Websense	4/12/2011	FTC-LABMD-003738	FTC-LABMD-003739
RX326	Managed Data Solutions Project	MDS Project Proposal - Websense			
CX0195	Proposal	Time Portion	4/12/2011	FTC-LABMD-003740	FTC-LABMD-003740

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX327		CX0149: Screenshot: LabMD - Tiversa.zip-WINRAR - insuranceaging_6.05.071.pdf			
CX0149		CX0150: Screenshot: C:\CX0151: Screenshot: C:\Program Files\LimeWire			
CX0150		CX0152: Screenshot: LimeWire: My Shared Files		FTC-LABMD-003752	FTC-LABMD-003755
CX0151	Tiversa folder screenshot	ScreenShot: LabMD - Tiversa.zip			
CX0152		WinRAR - LabMD folder		FTC-LABMD-003757	FTC-LABMD-003757
RX328	LabMD folder screenshot	CX0154: Screenshot: LimeWire Get Started			
CX0153		CX0155: Screenshot: Start Menu: LimeWire			
RX329		CX0156: Screenshot: LimeWire: Options: Shared Folders		FTC-LABMD-003758	FTC-LABMD-003760
CX0154		ScreenShot: insuranceaging_6.05.071.pdf			
CX0155	Insurance Aging pdf window screenshot	Properties	5/14/2008	FTC-LABMD-003761	FTC-LABMD-003761
CX0156	Limewire screenshot	SPD NetAnalysis Report		FTC-SAC-000679	FTC-SAC-000682
RX330	SacPD Netanalysis re: Maldonado and Garcia				
RX331		Letter from Southeast Urology Network	12/6/2013	FTC-SUN-000001	FTC-SUN-000003
RX332	Letter to M. Cox from R.J. Maxay	LabMD Compliance Program - effective Jan. 2003, signature pages	Jan-03	FTC-LABMD-003763	FTC-LABMD-003776
CX0225	LabMD Compliance Program	LabMD Employee Handbook Rev. Oct. 2007 - signature pages	Oct-07	FTC-LABMD-003819	FTC-LABMD-003865
RX334	LabMD Employee Handbook	RecordInvent	12/22/2013	FTC-ALT-0000001	FTC-ALT-0000003
CX0129	LabMD "Network Invent" summary	APT Service Invoice		FTC-ALT-0000004	FTC-ALT-0000011
RX336	Automated PC Technologies Invoice	Midtown Urology Unofficial Protocol of Patient Information Transmittal			
CX0130	Unofficial protocol for document transmission between LabMD and Midtown Urology	LabMD Letter to Physicians Offices re: Closing		FTC-MID-000009	FTC-MID-000010
RX344	LabMD closure announcement		1/6/2014	FTC-MID-000011	FTC-MID-000012
CX0397					
RX345					
CX0398					
RX356					
CX0290					
RX357					
CX0291					

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX362		LabMD IT Project Outline - Network, Hardware, Software changes		FTC-LABMD-004394	FTC-LABMD-004395
CX0313	LabMD IT project outline	Spreadsheet of IT Expenditures 2005-2013 native file		FTC-LABMD-016184	FTC-LABMD-016221
RX412	IT expenditure chart	Cypress Master Terms and Conditions (Bates-labeled version)	8/11/2008	(FTC-CYP-0001554)	(FTC-CYP-0001570)
CX0683		LabMD Day Sheets and Copied Checks		FTC-SAC-000001	FTC-SAC-000044
RX482	Cyprus Master Terms				
CX0678					
RX521	RX3 Yodaiken deposition				
CX0085					
Category 2: Non-shared Exhibits to which Neither Party Objects					
CX0770		FTC Consumer Alert: File-Sharing: A Fair Share? Maybe Not	7/29/2003	FTC-000685	FTC-000689
CX0771		Press Release: Council of Better Business Bureaus, National Cyber Security Alliance, Federal Trade Commission, Offer Businesses Tips For Keeping Their Computer Systems Secure	4/2/2004	FTC-000690	FTC-000692
CX0772		Press Release: FTC Testifies on Peer to Peer File Sharing and Online Pornography	5/6/2004	FTC-000693	FTC-000694
CX0773		Prepared Statement of FTC: Hearing on Online Pornography: Closing the Door on Pervasive Smut	5/6/2004	FTC-000695	FTC-000705
CX0774		Press Release: Peer-to-Peer File-Sharing Risks Can Be Better Disclosed	6/23/2004	FTC-000706	FTC-000707
CX0775		Prepared Statement of FTC: Hearing on P2P File-Sharing Technology	6/23/2004	FTC-000708	FTC-000717
CX0776		Press Release: FTC Issues Report on Peer-to-Peer File Sharing	6/23/2005	FTC-000718	FTC-000719
CX0777		FTC Staff Report: Peer-to-Peer File-Sharing Technology: Consumer Protection and Competition Issues: A Federal Trade Commission Staff Workshop Report	6/23/2005	FTC-000720	FTC-000806

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
CX0778		Revised FTC Consumer Alert: P2P File-Sharing: Evaluating the Risks	6/23/2005	FTC-000807	FTC-000811
CX0779		Revised FTC Consumer Alert: P2P File-Sharing: Evaluating the Risks	7/18/2005	FTC-000812	FTC-000817
CX0780		Revised FTC Spanish Consumer Alert: File-Sharing: Evaluating the Risks	8/18/2005	FTC-000818	FTC-000823
CX0781		FTC Distribution: Stop.Think.Click: 7 Practices for Safer Computing	9/16/2005	FTC-000824	FTC-000832
CX0782		FTC Spanish Distribution: Stop. Think. Click brochure	10/28/2005	FTC-000833	FTC-000843
CX0783		FTC Spanish Distribution: New version of Stop. Think. Click brochure	11/4/2005	FTC-000844	FTC-000852
CX0784		FTC Distribution: Revised P2P File Sharing: Evaluate the Risks	12/9/2006	FTC-000853	FTC-000857
CX0785		Revised FTC Spanish Consumer Alert: File-Sharing: Evaluating the Risks	2/27/2007	FTC-000858	FTC-000863
CX0786		Press Release: FTC Testifies on Potential Risks of Peer-to-Peer File Sharing	7/24/2007	FTC-000864	FTC-000865
CX0787		Prepared Statement of FTC on Peer-To-Peer File-Sharing Technology Issues	7/24/2007	FTC-000866	FTC-000877
CX0788		FTC Distribution: Revised P2P File Sharing: Evaluate the Risks	4/30/2008	FTC-000878	FTC-000886
CX0789		Revised FTC Spanish Consumer Alert: File-Sharing: Evaluating the Risks	4/30/2008	FTC-000887	FTC-000893
RX2	Insurance company web access sheet		9/12/2007	FTC-000279	FTC-000279
RX3	IT Staff Checklist			FTC-000366	FTC-000367
RX4	website list			FTC-000370	FTC-000375
RX5	windows screenshot			FTC-000376	FTC-000376
RX16	Calendar Meeting Request		5/14/2010	FTC-PVD-000041	FTC-PVD-000041
RX17	Calendar Meeting Request		5/24/2010	FTC-PVD-000042	FTC-PVD-000042
RX18	Calendar Meeting Request		7/16/2010	FTC-PVD-000043	FTC-PVD-000043
RX19	Letter from Mike Daugherty to ProviDyn, Inc.		5/28/2010	FTC-PVD-000044	FTC-PVD-000044

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX20	Service Solutions Proposal for LabMD from ProviDyn		2010	FTC-PVD-000045	FTC-PVD-000048
RX23	Full Report Analysis		7/28/2010	FTC-PVD-000175	FTC-PVD-000201
RX31	Full Report Analysis		9/3/2010	FTC-PVD-000541	FTC-PVD-000567
RX32	Full Report Analysis		9/3/2010	FTC-PVD-000592	FTC-PVD-000615
RX33	Full Report Analysis		9/3/2010	FTC-PVD-000616	FTC-PVD-000639
RX34	Full Report Analysis		9/3/2010	FTC-PVD-000640	FTC-PVD-000664
RX35	Full Report Analysis		9/3/2010	FTC-PVD-000665	FTC-PVD-000689
RX36	Full Report Analysis		9/3/2010	FTC-PVD-000739	FTC-PVD-000811
RX41	Email from J. Boyle to R. Boback re: Breach Notification				
RX47	MediPro Sale Invoices		11/18/2008	FTC-LABMD-000264	FTC-LABMD-000267
RX48	MediPro Sales Invoice		11/13/2008	FTC-LABMD-000268	FTC-LABMD-000268
RX49	MediPro Sales Invoice		4/4/2007	FTC-LABMD-000269	FTC-LABMD-000269
RX50	Email between Boyle and Tiversa		5/13/2008	FTC-LABMD-000287	FTC-LABMD-000287
RX51	Email between Boyle and Tiversa		5/13/2008	FTC-LABMD-000288	FTC-LABMD-000288
RX52	Email between Boyle and Tiversa		5/13/2008	FTC-LABMD-000290	FTC-LABMD-000290
RX53	Email between Boyle, Daugherty, and Tiversa				
RX54	Email between Boyle and Tiversa		5/15/2008	FTC-LABMD-000291	FTC-LABMD-000293
RX55	Email between Boyle and Tiversa		5/22/2008	FTC-LABMD-000294	FTC-LABMD-000294
RX56	Email between Boyle and Tiversa		5/23/2008	FTC-LABMD-000295	FTC-LABMD-000298
RX57	Email between Boyle and Tiversa		5/30/2008	FTC-LABMD-000299	FTC-LABMD-000299
RX58	Email between Boyle and Daugherty re: breach		6/6/2008	FTC-LABMD-000300	FTC-LABMD-000300
RX59	Email between Boyle and Tiversa re: breach		6/15/2008	FTC-LABMD-000301	FTC-LABMD-000302
RX70	LabMD Compliance Program		7/22/2008	FTC-LABMD-000303	FTC-LABMD-000303
RX71	LabMD Employee Handbook			FTC-LABMD-000719	FTC-LABMD-000728
RX73	Certification page signed by Daugherty			FTC-LABMD-000732	FTC-LABMD-000753
RX74	LabMD Computer Hardware and Security Manual		7/14/2010	FTC-LABMD-002522	FTC-LABMD-002522
RX97	Daily IT Walk			FTC-LABMD-002525	FTC-LABMD-002556
RX98	Daily IT Walk		5/27/2008	FTC-LABMD-002636	FTC-LABMD-002636
RX99	Daily IT Walk		5/28/2008	FTC-LABMD-002637	FTC-LABMD-002637
			6/2/2008	FTC-LABMD-002638	FTC-LABMD-002638

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX100	Daily IT Walk		6/3/2008	FTC-LABMD-002639	FTC-LABMD-002639
RX101	Daily IT Walk		6/4/2008	FTC-LABMD-002640	FTC-LABMD-002640
RX102	Daily IT Walk		6/5/2008	FTC-LABMD-002641	FTC-LABMD-002641
RX103	Daily IT Walk		6/6/2008	FTC-LABMD-002642	FTC-LABMD-002642
RX104	Daily IT Walk		6/10/2008	FTC-LABMD-002643	FTC-LABMD-002643
RX105	Daily IT Walk		6/11/2008	FTC-LABMD-002644	FTC-LABMD-002644
RX106	Daily IT Walk		6/12/2008	FTC-LABMD-002645	FTC-LABMD-002645
RX107	Daily IT Walk		6/17/2008	FTC-LABMD-002646	FTC-LABMD-002646
RX108	Daily IT Walk		7/2/2008	FTC-LABMD-002647	FTC-LABMD-002647
RX109	Daily IT Walk		7/3/2008	FTC-LABMD-002648	FTC-LABMD-002648
RX110	Daily IT Walk		7/10/2008	FTC-LABMD-002649	FTC-LABMD-002649
RX111	Daily IT Walk		7/14/2008	FTC-LABMD-002650	FTC-LABMD-002650
RX112	Daily IT Walk		7/15/2008	FTC-LABMD-002651	FTC-LABMD-002651
RX113	Daily IT Walk		7/16/2008	FTC-LABMD-002652	FTC-LABMD-002652
RX114	Daily IT Walk		7/18/2008	FTC-LABMD-002653	FTC-LABMD-002653
RX115	Daily IT Walk		7/22/2008	FTC-LABMD-002654	FTC-LABMD-002654
RX116	Daily IT Walk		7/29/2008	FTC-LABMD-002655	FTC-LABMD-002655
RX117	Daily IT Walk		7/30/2008	FTC-LABMD-002656	FTC-LABMD-002656
RX118	Daily IT Walk		7/31/2008	FTC-LABMD-002657	FTC-LABMD-002657
RX119	LabMD email re: walk arounds		3/12/2009	FTC-LABMD-002658	FTC-LABMD-002658
RX120	LabMD email re: walk arounds		3/13/2009	FTC-LABMD-002659	FTC-LABMD-002659
RX121	LabMD email re: walk arounds		3/17/2009	FTC-LABMD-002660	FTC-LABMD-002660
RX122	LabMD email re: walk arounds		3/23/2009	FTC-LABMD-002661	FTC-LABMD-002661
RX123	LabMD email re: walk arounds		3/30/2009	FTC-LABMD-002662	FTC-LABMD-002662
RX124	LabMD email re: walk arounds		4/1/2009	FTC-LABMD-002663	FTC-LABMD-002663
RX125	LabMD email re: walk arounds		4/3/2009	FTC-LABMD-002664	FTC-LABMD-002664
RX126	LabMD email re: walk arounds		4/6/2009	FTC-LABMD-002665	FTC-LABMD-002665
RX127	LabMD email re: walk arounds		4/10/2009	FTC-LABMD-002666	FTC-LABMD-002666
RX128	LabMD email re: walk arounds		4/13/2009	FTC-LABMD-002667	FTC-LABMD-002667
RX129	LabMD email re: walk arounds		4/16/2009	FTC-LABMD-002668	FTC-LABMD-002668
RX130	LabMD email re: walk arounds		5/19/2009	FTC-LABMD-002669	FTC-LABMD-002669
RX131	LabMD email re: walk arounds		5/20/2009	FTC-LABMD-002670	FTC-LABMD-002670
RX132	LabMD email re: walk arounds		5/22/2009	FTC-LABMD-002671	FTC-LABMD-002671
RX133	LabMD email re: walk arounds		5/26/2009	FTC-LABMD-002672	FTC-LABMD-002672
RX134	LabMD email re: walk arounds		6/2/2009	FTC-LABMD-002673	FTC-LABMD-002673
RX135	LabMD email re: walk arounds		6/11/2009	FTC-LABMD-002674	FTC-LABMD-002674

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX136	LabMD email re: walk arounds		6/12/2009	FTC-LABMD-002675	FTC-LABMD-002675
RX137	LabMD email re: walk arounds		6/15/2009	FTC-LABMD-002676	FTC-LABMD-002676
RX138	LabMD email re: walk arounds		6/16/2009	FTC-LABMD-002677	FTC-LABMD-002677
RX139	LabMD email re: walk arounds		6/17/2009	FTC-LABMD-002678	FTC-LABMD-002678
RX140	LabMD email re: walk arounds		6/18/2009	FTC-LABMD-002679	FTC-LABMD-002679
RX141	LabMD email re: walk arounds		6/19/2009	FTC-LABMD-002680	FTC-LABMD-002680
RX142	LabMD email re: walk arounds		6/22/2009	FTC-LABMD-002681	FTC-LABMD-002681
RX143	LabMD email re: walk arounds		6/23/2009	FTC-LABMD-002682	FTC-LABMD-002682
RX144	LabMD email re: walk arounds		6/23/2009	FTC-LABMD-002683	FTC-LABMD-002683
RX145	LabMD email re: walk arounds		6/24/2009	FTC-LABMD-002684	FTC-LABMD-002684
RX146	LabMD email re: walk arounds		6/25/2009	FTC-LABMD-002685	FTC-LABMD-002685
RX147	LabMD email re: walk arounds		6/26/2009	FTC-LABMD-002686	FTC-LABMD-002686
RX148	LabMD email re: walk arounds		6/29/2009	FTC-LABMD-002687	FTC-LABMD-002687
RX149	LabMD email re: walk arounds		7/24/2009	FTC-LABMD-002688	FTC-LABMD-002688
RX150	LabMD email re: walk arounds		7/25/2009	FTC-LABMD-002689	FTC-LABMD-002689
RX151	LabMD email re: walk arounds		7/17/2009	FTC-LABMD-002690	FTC-LABMD-002690
RX152	LabMD email re: walk arounds		7/20/2009	FTC-LABMD-002691	FTC-LABMD-002691
RX153	LabMD email re: walk arounds		7/21/2009	FTC-LABMD-002692	FTC-LABMD-002692
RX154	LabMD email re: walk arounds		7/22/2009	FTC-LABMD-002693	FTC-LABMD-002693
RX155	LabMD email re: walk arounds		7/24/2009	FTC-LABMD-002694	FTC-LABMD-002694
RX156	LabMD email re: walk arounds		7/27/2009	FTC-LABMD-002695	FTC-LABMD-002695
RX157	LabMD email re: walk arounds		7/28/2009	FTC-LABMD-002696	FTC-LABMD-002696
RX158	LabMD email re: walk arounds		7/29/2009	FTC-LABMD-002697	FTC-LABMD-002697
RX159	LabMD email re: walk arounds		7/31/2009	FTC-LABMD-002698	FTC-LABMD-002698
RX160	LabMD email re: walk arounds		8/2/2009	FTC-LABMD-002699	FTC-LABMD-002699
RX161	LabMD email re: walk arounds		8/4/2009	FTC-LABMD-002700	FTC-LABMD-002700
RX162	LabMD email re: walk arounds		8/5/2009	FTC-LABMD-002701	FTC-LABMD-002701
RX163	LabMD email re: walk arounds		8/10/2009	FTC-LABMD-002702	FTC-LABMD-002702
RX164	LabMD email re: walk arounds		8/11/2009	FTC-LABMD-002703	FTC-LABMD-002703
RX165	LabMD email re: walk arounds		8/12/2009	FTC-LABMD-002704	FTC-LABMD-002704
RX166	LabMD email re: walk arounds		8/13/2009	FTC-LABMD-002705	FTC-LABMD-002705
RX167	LabMD email re: walk arounds		8/14/2009	FTC-LABMD-002706	FTC-LABMD-002706
RX168	LabMD email re: walk arounds		8/18/2009	FTC-LABMD-002711	FTC-LABMD-002711
RX169	LabMD email re: walk arounds		8/28/2009	FTC-LABMD-002714	FTC-LABMD-002714
RX171	LabMD Virus Log			FTC-LABMD-003124	FTC-LABMD-003127
RX174	LabMD email re: Daily IT Rounds		8/7/2007	FTC-LABMD-003166	FTC-LABMD-003166

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX175	LabMD email re: Daily IT Rounds		8/8/2007	FTC-LABMD-003167	FTC-LABMD-003167
RX176	LabMD email re: Daily IT Rounds		8/13/2007	FTC-LABMD-003168	FTC-LABMD-003168
RX177	LabMD email re: Daily IT Rounds		8/14/2007	FTC-LABMD-003169	FTC-LABMD-003169
RX178	LabMD email re: Daily IT Rounds		8/14/2007	FTC-LABMD-003171	FTC-LABMD-003171
RX179	LabMD email re: Daily IT Rounds		8/16/2007	FTC-LABMD-003172	FTC-LABMD-003172
RX180	LabMD email re: Daily IT Rounds		8/17/2007	FTC-LABMD-003173	FTC-LABMD-003173
RX181	LabMD email re: Daily IT Rounds		8/21/2007	FTC-LABMD-003174	FTC-LABMD-003174
RX183	LabMD email re: Daily IT Rounds		8/23/2007	FTC-LABMD-003176	FTC-LABMD-003176
RX184	LabMD email re: Daily IT Rounds		8/24/2007	FTC-LABMD-003177	FTC-LABMD-003177
RX185	LabMD email re: Daily IT Rounds		8/27/2007	FTC-LABMD-003178	FTC-LABMD-003178
RX186	LabMD email re: Daily IT Rounds		8/28/2007	FTC-LABMD-003179	FTC-LABMD-003179
RX187	LabMD email re: Daily IT Rounds		8/30/2007	FTC-LABMD-003180	FTC-LABMD-003180
RX188	LabMD email re: Daily IT Rounds		8/30/2007	FTC-LABMD-003181	FTC-LABMD-003181
RX189	LabMD email re: Daily IT Rounds		9/11/2007	FTC-LABMD-003183	FTC-LABMD-003183
RX190	LabMD email re: Daily IT Rounds		9/12/2007	FTC-LABMD-003184	FTC-LABMD-003184
RX191	LabMD email re: Daily IT Rounds		9/13/2007	FTC-LABMD-003185	FTC-LABMD-003185
RX192	LabMD email re: Daily IT Rounds		9/14/2007	FTC-LABMD-003186	FTC-LABMD-003186
RX193	LabMD email re: Daily IT Rounds		9/17/2007	FTC-LABMD-003187	FTC-LABMD-003187
RX194	LabMD email re: Daily IT Rounds		9/18/2007	FTC-LABMD-003188	FTC-LABMD-003188
RX195	LabMd Email re: Daily IT Rounds		9/20/2007	FTC-LABMD-003189	FTC-LABMD-003189
RX196	LabMd Email re: Daily IT Rounds		9/26/2007	FTC-LABMD-003190	FTC-LABMD-003190
RX197	LabMd Email re: Daily IT Rounds		9/27/2007	FTC-LABMD-003191	FTC-LABMD-003191
RX198	LabMd Email re: Daily IT Rounds		10/2/2007	FTC-LABMD-003193	FTC-LABMD-003193
RX199	LabMd Email re: Daily IT Rounds		10/8/2007	FTC-LABMD-003196	FTC-LABMD-003196
RX200	LabMd Email re: Daily IT Rounds		10/11/2007	FTC-LABMD-003197	FTC-LABMD-003197
RX201	LabMd Email re: Daily IT Rounds		10/16/2007	FTC-LABMD-003198	FTC-LABMD-003198
RX202	LabMd Email re: Daily IT Rounds		10/19/2007	FTC-LABMD-003199	FTC-LABMD-003199
RX203	LabMd Email re: Daily IT Rounds		10/25/2007	FTC-LABMD-003201	FTC-LABMD-003201
RX204	LabMd Email re: Daily IT Rounds		10/28/2007	FTC-LABMD-003202	FTC-LABMD-003202
RX205	LabMd Email re: Daily IT Rounds		10/30/2007	FTC-LABMD-003204	FTC-LABMD-003204
RX206	LabMd Email re: Daily IT Rounds		11/5/2007	FTC-LABMD-003207	FTC-LABMD-003207
RX207	LabMd Email re: Daily IT Rounds		11/7/2007	FTC-LABMD-003208	FTC-LABMD-003208
RX208	LabMd Email re: Daily IT Rounds		11/9/2007	FTC-LABMD-003209	FTC-LABMD-003209
RX209	LabMd Email re: Daily IT Rounds		11/15/2007	FTC-LABMD-003210	FTC-LABMD-003210
RX210	LabMd Email re: Daily IT Rounds		11/19/2007	FTC-LABMD-003211	FTC-LABMD-003211
RX211	LabMd Email re: Daily IT Rounds		11/20/2007	FTC-LABMD-003212	FTC-LABMD-003212

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX213	LabMd Email re: Daily IT Rounds		11/23/2007	FTC-LABMD-003214	FTC-LABMD-003214
RX214	LabMd Email re: Daily IT Rounds		11/26/2007	FTC-LABMD-003215	FTC-LABMD-003215
RX215	LabMd Email re: Daily IT Rounds		11/30/2007	FTC-LABMD-003216	FTC-LABMD-003216
RX216	LabMd Email re: Daily IT Rounds		12/3/2007	FTC-LABMD-003217	FTC-LABMD-003217
RX217	LabMd Email re: Daily IT Rounds		12/4/2007	FTC-LABMD-003218	FTC-LABMD-003218
RX218	LabMd Email re: Daily IT Rounds		12/5/2007	FTC-LABMD-003219	FTC-LABMD-003219
RX219	LabMd Email re: Daily IT Rounds		12/7/2007	FTC-LABMD-003220	FTC-LABMD-003220
RX220	LabMd Email re: Daily IT Rounds		12/17/2007	FTC-LABMD-003221	FTC-LABMD-003221
RX221	LabMd Email re: Daily IT Rounds		12/20/2007	FTC-LABMD-003223	FTC-LABMD-003223
RX222	LabMd Email re: Daily IT Rounds		1/2/2008	FTC-LABMD-003224	FTC-LABMD-003224
RX223	LabMd Email re: Daily IT Rounds		1/3/2008	FTC-LABMD-003225	FTC-LABMD-003225
RX224	LabMd Email re: Daily IT Rounds		1/8/2008	FTC-LABMD-003226	FTC-LABMD-003226
RX225	LabMd Email re: Daily IT Rounds		1/9/2008	FTC-LABMD-003227	FTC-LABMD-003227
RX226	LabMd Email re: Daily IT Rounds		1/11/2008	FTC-LABMD-003228	FTC-LABMD-003228
RX227	LabMd Email re: Daily IT Rounds		1/15/2008	FTC-LABMD-003229	FTC-LABMD-003229
RX228	LabMd Email re: Daily IT Rounds		1/16/2008	FTC-LABMD-003230	FTC-LABMD-003230
RX229	LabMd Email re: Daily IT Rounds		1/17/2008	FTC-LABMD-003231	FTC-LABMD-003231
RX230	LabMd Email re: Daily IT Rounds		1/21/2008	FTC-LABMD-003232	FTC-LABMD-003232
RX231	LabMd Email re: Daily IT Rounds		1/24/2008	FTC-LABMD-003233	FTC-LABMD-003233
RX232	LabMd Email re: Daily IT Rounds		1/29/2008	FTC-LABMD-003234	FTC-LABMD-003234
RX233	LabMd Email re: Daily IT Rounds		1/31/2008	FTC-LABMD-003235	FTC-LABMD-003235
RX234	LabMd Email re: Daily IT Rounds		2/5/2008	FTC-LABMD-003236	FTC-LABMD-003236
RX235	LabMd Email re: Daily IT Rounds		2/6/2008	FTC-LABMD-003237	FTC-LABMD-003237
RX236	LabMd Email re: Daily IT Rounds		3/15/2008	FTC-LABMD-003238	FTC-LABMD-003238
RX237	LabMd Email re: Daily IT Rounds		3/17/2008	FTC-LABMD-003239	FTC-LABMD-003239
RX238	LabMd Email re: Daily IT Rounds		3/20/2008	FTC-LABMD-003240	FTC-LABMD-003240
RX239	LabMd Email re: Daily IT Rounds		3/28/2008	FTC-LABMD-003241	FTC-LABMD-003241
RX240	LabMd Email re: Daily IT Rounds		4/22/2008	FTC-LABMD-003242	FTC-LABMD-003242
RX241	LabMd Email re: Daily IT Rounds		4/24/2008	FTC-LABMD-003243	FTC-LABMD-003243
RX242	LabMd Email re: Daily IT Rounds		5/9/2008	FTC-LABMD-003244	FTC-LABMD-003244
RX243	LabMd Email re: Daily IT Rounds		5/27/2008	FTC-LABMD-003245	FTC-LABMD-003245
RX244	LabMd Email re: Daily IT Rounds		5/28/2008	FTC-LABMD-003246	FTC-LABMD-003246
RX245	LabMd Email re: Daily IT Rounds		6/2/2008	FTC-LABMD-003247	FTC-LABMD-003247
RX246	LabMd Email re: Daily IT Rounds		6/3/2008	FTC-LABMD-003248	FTC-LABMD-003248
RX247	LabMd Email re: Daily IT Rounds		6/4/2008	FTC-LABMD-003249	FTC-LABMD-003249
RX248	LabMd Email re: Daily IT Rounds		6/5/2008	FTC-LABMD-003250	FTC-LABMD-003250

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX249	LabMd Email re: Daily IT Rounds		6/6/2008	FTC-LABMD-003251	FTC-LABMD-003251
RX250	LabMd Email re: Daily IT Rounds		6/10/2008	FTC-LABMD-003252	FTC-LABMD-003252
RX251	LabMd Email re: Daily IT Rounds		6/11/2008	FTC-LABMD-003253	FTC-LABMD-003253
RX252	LabMd Email re: Daily IT Rounds		6/12/2008	FTC-LABMD-003254	FTC-LABMD-003254
RX253	LabMd Email re: Daily IT Rounds		6/17/2008	FTC-LABMD-003255	FTC-LABMD-003255
RX254	LabMd Email re: Daily IT Rounds		7/2/2008	FTC-LABMD-003256	FTC-LABMD-003256
RX255	LabMd Email re: Daily IT Rounds		7/3/2008	FTC-LABMD-003257	FTC-LABMD-003257
RX256	LabMd Email re: Daily IT Rounds		7/10/2008	FTC-LABMD-003258	FTC-LABMD-003258
RX257	LabMd Email re: Daily IT Rounds		7/14/2008	FTC-LABMD-003259	FTC-LABMD-003259
RX258	LabMd Email re: Daily IT Rounds		7/15/2008	FTC-LABMD-003260	FTC-LABMD-003260
RX259	LabMd Email re: Daily IT Rounds		7/16/2008	FTC-LABMD-003261	FTC-LABMD-003261
RX260	LabMd Email re: Daily IT Rounds		7/18/2008	FTC-LABMD-003262	FTC-LABMD-003262
RX261	LabMd Email re: Daily IT Rounds		7/22/2008	FTC-LABMD-003263	FTC-LABMD-003263
RX262	LabMd Email re: Daily IT Rounds		7/29/2008	FTC-LABMD-003264	FTC-LABMD-003264
RX263	LabMd Email re: Daily IT Rounds		7/30/2008	FTC-LABMD-003265	FTC-LABMD-003265
RX264	LabMd Email re: Daily IT Rounds		7/31/2008	FTC-LABMD-003266	FTC-LABMD-003266
RX275	TrendMicro Daily Virus Report - July 2010		7/30/2010	FTC-LABMD-003359	FTC-LABMD-003363
RX276	TrendMicro Daily Virus Report - July 2010		7/29/2010	FTC-LABMD-003364	FTC-LABMD-003368
RX277	TrendMicro Daily Virus Report - July 2010		7/24/2010	FTC-LABMD-003369	FTC-LABMD-003373
RX278	TrendMicro Daily Virus Report - July 2010		7/20/2010	FTC-LABMD-003374	FTC-LABMD-003378
RX279	TrendMicro Daily Virus Report - July 2010		7/27/2010	FTC-LABMD-003379	FTC-LABMD-003383
RX280	TrendMicro Daily Virus Report - July 2010		7/26/2010	FTC-LABMD-003384	FTC-LABMD-003388
RX281	TrendMicro Daily Virus Report - July 2010		7/16/2010	FTC-LABMD-003389	FTC-LABMD-003393
RX282	TrendMicro Daily Virus Report - July 2010		7/15/2010	FTC-LABMD-003394	FTC-LABMD-003398
RX283	TrendMicro Daily Virus Report - July 2010		7/23/2010	FTC-LABMD-003399	FTC-LABMD-003403
RX285	TrendMicro Daily Virus Report - July 2010		7/19/2010	FTC-LABMD-003413	FTC-LABMD-003417

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX286	TrendMicro Daily Virus Report - July 2010		7/18/2010	FTC-LABMD-003418	FTC-LABMD-003422
RX287	TrendMicro Daily Virus Report - July 2010		7/21/2010	FTC-LABMD-003423	FTC-LABMD-003427
RX289	Malware Quickscan Log			FTC-LABMD-003429	FTC-LABMD-003429
RX290	Malware Quickscan Log			FTC-LABMD-003430	FTC-LABMD-003430
RX291	Malware Quickscan Log			FTC-LABMD-003431	FTC-LABMD-003431
RX292	Malware Quickscan Log			FTC-LABMD-003432	FTC-LABMD-003432
RX293	Malware Quickscan Log			FTC-LABMD-003433	FTC-LABMD-003433
RX294	Malware Quickscan Log			FTC-LABMD-003434	FTC-LABMD-003434
RX295	Malware Quickscan Log			FTC-LABMD-003435	FTC-LABMD-003435
RX296	Malware Quickscan Log			FTC-LABMD-003436	FTC-LABMD-003436
RX297	Malware Quickscan Log			FTC-LABMD-003437	FTC-LABMD-003437
RX299	Malware Quickscan Log		7/1/2010	FTC-LABMD-003439	FTC-LABMD-003439
RX300	Malware Quickscan Log		7/5/2010	FTC-LABMD-003440	FTC-LABMD-003440
RX301	Malware Quickscan Log		7/22/2010	FTC-LABMD-003441	FTC-LABMD-003441
RX302	Malware Quickscan Log		7/22/2010	FTC-LABMD-003442	FTC-LABMD-003442
RX303	Malware Quickscan Log		7/25/2010	FTC-LABMD-003443	FTC-LABMD-003443
RX305	LabMD Employee Separation Agreement - Patrick Howard		7/3/2004	FTC-LABMD-003461	FTC-LABMD-003470
RX311	LabMD Employee Handbook acknowledgment page-Woodson		5/16/2007	FTC-LABMD-003586	FTC-LABMD-003586
RX324	LabMD Serverroom virus scan - July 2010			FTC-LABMD-003737	FTC-LABMD-003737
RX337	Form Letter from LabMD to affected patients		3/27/2013	FTC-LABMD-003913	FTC-LABMD-003915
RX338	Handbook Receipt Signed By Adnan Savera		11/9/2007	FTC-LABMD-004098	FTC-LABMD-004098
RX340	Email From J. Boyle To mikelabmd@gmail.com; mdort@aol.com		9/27/2010	FTC-LABMD-004305	FTC-LABMD-004309
RX341	Email From G. Schultz to R. Boback		5/23/2008	FTC-LABMD-004310	FTC-LABMD-004313
RX342	Email from J. Boyle to W. Hardin re: Preventative Maintenance		1/5/2007	FTC-LABMD-004339	FTC-LABMD-004339
RX343	Email from W. Hardin to J. Boyle re: preventative maintenance		1/5/2007	FTC-LABMD-004340	FTC-LABMD-004341

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX347	Email from K. Jestes to M. Wood re: RedactedLabMdsLetter		4/8/2013	FTC-SAC-001108	FTC-SAC-001108
RX348	LabMD Patient Notification Letter [redacted]		3/27/2013	FTC-SAC-001109	FTC-SAC-001110
RX349	Email from A. Sheer to K. Jestes re: Hi Karina - The package arrived safe and sound. Alain.		10/31/2012	FTC-SAC-001130	FTC-SAC-001130
RX350	Email from K. Jestes to A. Sheer re: LabMD		4/7/2013	FTC-SAC-001134	FTC-SAC-001134
RX351	Email from A. Sheer to K. Jestes re: LabMD from Sacramento Police		10/9/2012	FTC-SAC-001142	FTC-SAC-001142
RX352	Email from R. Yodaiken to K. Jestes re: LabMD		10/11/2012	FTC-SAC-001143	FTC-SAC-001143
RX353	Email from R. Yodaiken to K. Jestes re: my first phone call		4/4/2013	FTC-SAC-001146	FTC-SAC-001146
RX354	Email from A. Sheer to K. Jestes re: my first phone call		4/4/2013	FTC-SAC-001148	FTC-SAC-001148
RX363	Email from J. Boyle to M. Daugherty re: Your Passwords		12/16/2010	FTC-LABMD-004396	FTC-LABMD-004400
RX364	J. Boyle email to M. Daugherty re: Hyer Software request		11/11/2010	FTC-LABMD-004401	FTC-LABMD-004401
RX405	LabMD Threat Scan		9/3/2010	FTC-LABMD-005222	FTC-LABMD-005248
RX406	LabMD Threat Scan		9/3/2010	FTC-LABMD-006246	FTC-LABMD-006270
RX407	LabMD Threat Scan		9/3/2010	FTC-LABMD-006448	FTC-LABMD-006471
RX408	LabMD Threat Scan		9/3/2010	FTC-LABMD-006472	FTC-LABMD-006495
RX409	LabMD Threat Scan		9/3/2010	FTC-LABMD-006496	FTC-LABMD-006519
RX410	LabMD Threat Scan		9/3/2010	FTC-LABMD-006520	FTC-LABMD-006544
RX411	Communications between J.Parr and TrendMicro re:service		12/5/2011	FTC-TRM-000574	FTC-TRM-000598
RX413	Veritas Server Backup Report		7/15/2010	FTC-LABMD-016032	FTC-LABMD-016038
RX415	Kaloustian background check/A. Simmons' resignation			FTC-LABMD-016180	FTC-LABMD-016181
RX416	L. Hudson Termination Notice		6/28/2007	FTC-LABMD-016182	FTC-LABMD-016183
RX421	Email: K. Jestes to D. Ojeda, Subject:		10/15/2012	FTC-SAC-001105	FTC-SAC-001105

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX422	Email: K. Jestes to A. Sheer and R. Yodaiken, Subject: Erick Garcia		3/11/2013	FTC-SAC-001106	FTC-SAC-001106
RX424	Email: K. Jestes to M. Wood, Subject: LabMD		4/8/2013	FTC-SAC-001108	FTC-SAC-001108
RX429	Email: A. Sheer to K. Jestes, Subject: LabMD (Attach: redacted LabMDs Letter(3.27.23).pdf)		4/2/2013	FTC-SAC-001115	FTC-SAC-001115
RX433	Email: A. Sheer to K. Jestes, Subject: LabMD		10/10/2012	FTC-SAC-001120	FTC-SAC-001120
RX435	Email: K. Jestes to A. Sheer and R. Yodaiken, Subject: my first phone call		4/4/2013	FTC-SAC-001122	FTC-SAC-001122
RX441	Email: A. Sheer to K. Jestes, Subject: Erick Garcia		3/11/2013	FTC-SAC-001128	FTC-SAC-001128
RX443	Email: A. Sheer to K. Jestes, Subject: Hi Karina. The package arrived safe and sound - thanks. Alain		10/31/2013	FTC-SAC-001130	FTC-SAC-001130
RX447	Email: K. Jestes to A. Sheer, Subject: LabMD		4/2/2013	FTC-SAC-001134	FTC-SAC-001134
RX448	Email: A. Sheer to K. Jestes, Subject: LabMD		4/2/2013	FTC-SAC-001135	FTC-SAC-001135
RX449	Email: A. Sheer to K. Jestes, Subject: LabMD		4/2/2013	FTC-SAC-001136	FTC-SAC-001136
RX450	Email: A. Sheer to K. Jestes, Subject: LabMD		4/3/2013	FTC-SAC-001137	FTC-SAC-001137
RX451	Email: A. Sheer to K. Jestes, Subject: LabMD		4/3/2013	FTC-SAC-001138	FTC-SAC-001138
RX452	Email: A. Sheer to K. Jestes, Subject: LabMD		10/11/2012	FTC-SAC-001139	FTC-SAC-001139
RX454	Email: A. Sheer to K. Jestes, Subject: LabMD from Sacramento Police		10/9/2012	FTC-SAC-001141	FTC-SAC-001141
RX455	Email: A. Sheer to K. Jestes, Subject: LabMD from Sacramento Police		10/9/2012	FTC-SAC-001142	FTC-SAC-001142

Joint Stipulations on Admissibility of Exhibits: Attachment A
Joint Exhibits

Exhibit No.	Respondent's Exhibit Description	Complaint Counsel's Exhibit Description	Date	Beg. Bates #	End Bates #
RX456	Email: R. Yodaiken to K. Jestes, Subject: LabMD		10/11/2012	FTC-SAC-001143	FTC-SAC-001143
RX459	Email: R. Yodaiken to K. Jestes, Subject: my first phone call		4/4/2013	FTC-SAC-001146	FTC-SAC-001146
RX460	Email: A. Sheer to K. Jestes, Subject: my first phone call		4/5/2013	FTC-SAC-001147	FTC-SAC-001147
RX461	Email: A. Sheer to K. Jestes, Subject: my first phone call		4/4/2013	FTC-SAC-001148	FTC-SAC-001148
RX463	Email: A. Sheer to K. Jestes, Subject: release of evidence		10/15/2012	FTC-SAC-001151	FTC-SAC-001151
RX464	Email: A. Sheer to K. Jestes, Subject: release of evidence		10/18/2012	FTC-SAC-001152	FTC-SAC-001152
RX465	Email: R. Yodaiken to A. Sheer and K. Jestes, Subject: release of evidence		10/18/2012	FTC-SAC-001153	FTC-SAC-001153
RX467	Email: A. Sheer to K. Jestes, Subject: release of evidence		10/15/2012	FTC-SAC-001156	FTC-SAC-001156
RX468	Email: R. Yodaiken to K. Jestes, Subject: Sac County Courts online		4/11/2013	FTC-SAC-001157	FTC-SAC-001157
RX472	Email: R. Yodaiken to K. Jestes, Subject: Update		2/14/2013	FTC-SAC-001161	FTC-SAC-001161
RX473	Email: K. Jestes to R. Yodaiken, Subject: release of evidence		10/15/2012	FTC-SAC-001162	FTC-SAC-001162
RX480	Email: K. Jestes to A. Sheer and R. Yodaiken, Subject: Update		2/14/2013	FTC-SAC-001169	FTC-SAC-001169
RX518	Complaint Counsel's Responses to LabMD's First Set of Interrogatories		3/26/2014		
RX526	Complaint Counsel's Amended Response to LabMD, Inc.'s First Set of Requests for Admission		4/1/2014		

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2014, I filed the foregoing document electronically through the Office of the Secretary's FTC E-filing system, which will send notification of such filing to:

Donald S. Clark
Secretary
Federal Trade Commission
600 Pennsylvania Avenue, NW, Room H-113
Washington, DC 20580

I also certify that I caused a copy of the foregoing document to be delivered *via* electronic mail and by hand to:

The Honorable D. Michael Chappell
Chief Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Avenue, NW, Room H-110
Washington, DC 20580

I further certify that I caused a copy of the foregoing document to be served *via* electronic mail to:

Michael Pepson
Lorinda Harris
Hallee Morgan
Robyn Burrows
Kent Huntington
Daniel Epstein
Patrick Massari
Cause of Action
1919 Pennsylvania Avenue, NW, Suite 650
Washington, DC 20006
michael.pepson@causeofaction.org
lorinda.harris@causeofaction.org
hallee.morgan@causeofaction.org
robyn.burrows@causeofaction.org
kent.huntington@causeofaction.org
daniel.epstein@causeofaction.org
patrick.massari@causeofaction.org

Reed Rubinstein
William A. Sherman, II
Sunni Harris
Dinsmore & Shohl, LLP

801 Pennsylvania Avenue, NW, Suite 610
Washington, DC 20004
reed.rubinstein@dinsmore.com
william.sherman@dinsmore.com
sunni.harris@dinsmore.com
Counsel for Respondent LabMD, Inc.

CERTIFICATE FOR ELECTRONIC FILING

I certify that the electronic copy sent to the Secretary of the Commission is a true and correct copy of the paper original and that I possess a paper original of the signed document that is available for review by the parties and the adjudicator.

May 14, 2014

By:



Jarad Brown
Federal Trade Commission
Bureau of Consumer Protection