



United States of America
FEDERAL TRADE COMMISSION
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January 21, 2021

VIA ELECTRONIC FILING (ECF)

The Honorable Peter J. Messitte
United States District Court
District of Maryland, Southern Division
6500 Cherrywood Lane, Suite 475A
Greenbelt, Maryland 20770
(301) 344-0632

**RE: *In re Sanctuary Belize Litigation*, No. 18-cv-3309-PJM (D. Md.)
Redress Plan Briefing Schedule**

Judge Messitte,

Today, the FTC filed a proposed order governing redress along with a motion summarizing the redress plan and seeking the order's entry.¹ The FTC will serve the Defendants and certain additional potentially interested parties. The FTC understands that the Receiver will serve other interested parties, including lot purchasers. Additionally, applying expertise in consumer communications, the FTC has further summarized certain plan elements and addressed likely questions through a Frequently Asked Questions ("FAQ") page on its website. A copy is Attachment A hereto.

The Court also directed the FTC to propose a schedule for submissions concerning the proposed plan. Although the need to commence redress quickly is critical, at least some time beyond what the Local Rules require is appropriate. Accordingly, the FTC proposes:

Oppositions to the motion to enter the Proposed Plan: February 19, 2021

Replies in support of the Proposed Plan (from both the FTC and, if appropriate, the Receiver): March 12, 2021

¹ Pursuant to the Court's order, ECF No. 1116 (Jan. 13, 2021), the FTC is also filing a short motion seeking clarification on certain limited issues associated with the Court's prior rulings.

A corresponding proposed order is Attachment B hereto.

Finally, the FTC anticipates that the Court may schedule a hearing concerning the proposed Redress Plan using remote technology or other COVID-safe procedures. Should the Court do so, we request that it set the hearing for mid-to-late March, subject to the Court's schedule.

Very truly yours,



Jonathan Cohen
Counsel to Plaintiff Federal Trade Commission

CC: All counsel and *pro se* parties (via ECF and email)