

**IN THE CIRCUIT COURT OF CLEBURNE COUNTY, ARKANSAS
CIVIL DIVISION**

**STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL**

PLAINTIFF

v.

CASE NO. 12CV-24-149

**PDD HOLDINGS INC. F/K/A PINDUODUO INC.
and WHALECO INC. D/B/A TEMU**

DEFENDANTS

DEFENDANT PDD HOLDINGS INC.’S ANSWER AND AFFIRMATIVE DEFENSES

Defendant PDD Holdings Inc. (“PDDH” or “Defendant”), by and through its attorneys, Friday, Eldredge & Clark, LLP and Gibson, Dunn & Crutcher, LLP, for its Answer to Plaintiff State of Arkansas, *ex rel.* Tim Griffin, Attorney General’s (“State” or “Plaintiff”) Amended Complaint, states as follows:

PRELIMINARY STATEMENT

The State’s Amended Complaint against PDDH relies on baseless factual assertions and does not show wrongdoing under any law. The State appears to target PDDH because it is the indirect corporate parent of Whaleco Inc. (“Whaleco”), the company that operates the Temu marketplace in the United States, and also the indirect parent of a different company that operates Pinduoduo, a different shopping app that does not serve the U.S. market or ship to the United States. But the Pinduoduo app has nothing to do with Temu or Arkansas, and PDDH is merely a holding company with no material operations of its own.

The State’s unwarranted attack is based on a discredited short-seller report (the “Grizzly Report”), which was written and released in an attempt to depress PDDH’s stock price so that the Report’s authors could profit from their short positions. The Grizzly Report expressly disclaims all “accuracy” and “completeness,” and admits to consisting of “opinions and beliefs only”— “not

statements of fact.” Unsurprisingly, the Grizzly Report cobbles together false and misleading statements by unknown, anonymous security “researchers” based on speculation, not facts. Nor do the Amended Complaint’s other purported sources—anonymous Reddit posts and a handful of unverified consumer complaints untethered from Arkansas—support these claims or justify the State’s inflammatory rhetoric. None of these sources are authenticated or sworn, nor do they identify a single Arkansas consumer who suffered any harm. The State’s claims are without merit, and Defendant is confident the evidence will show the allegations are untrue. Defendant categorically denies the State’s allegations and raises affirmative defenses. As a holding company with no material operations of its own, Defendant affirmatively states that it is without sufficient knowledge or information to admit or deny many of the allegations contained in the Amended Complaint about the operations of the Temu marketplace, which is operated by Whaleco.

The State’s Amended Complaint purports to reference numerous documents, articles, third-party publications, and statements that are excerpted, mischaracterized, and otherwise taken out of context. The referenced materials should be considered, if at all, in their unmodified forms. Although Defendant has undertaken an effort to identify instances in which the references do not match the cited materials, Defendant respectfully refers the Court to the respective materials for their complete and accurate contents. Additionally, the State’s Amended Complaint contains irrelevant, slanted commentary, and Defendant reserves the right to move to strike these portions of the Amended Complaint under Arkansas Rule of Civil Procedure 12(f). Except as otherwise expressly stated below, Defendant denies each and every allegation in the Amended Complaint—including all allegations in the subparagraphs, prayers for relief, titles, headings, sub-headings, tables of contents, footnotes, tables, graphs, and illustrations—and specifically denies liability to the State of Arkansas. To the extent not expressly denied, all allegations for which Defendant

denies possessing knowledge or information sufficient to admit or deny are denied. To the extent the allegations in the Amended Complaint are directed at multiple Defendants, PDDH answers the allegations only on behalf of itself. Defendant reserves the right to seek to amend and supplement this Answer as may be appropriate or necessary.

ANSWER

1. Paragraph 1 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 1.

2. Defendant denies the allegations contained in Paragraph 2 except that Defendant admits that the State has chosen to characterize its Arkansas Deceptive Trade Practices Act (“ADTPA”) claims in two categories: commercial claims and privacy claims.

3. Paragraph 3 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 3.

4. Paragraph 4 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 4.

5. Defendant denies that it launched the Temu marketplace. Defendant admits that Whaleco launched the Temu marketplace in the United States in 2022, which allows users to purchase goods from third-party sellers, some of which are manufactured in China. With respect to the photo embedded in Paragraph 5, Defendant is without sufficient knowledge or information to admit or deny the origin, authenticity, date, source, or completeness of the information contained in the photo, and therefore denies same. Defendant denies any remaining allegations contained in Paragraph 5.

6. Defendant admits that PDDH is listed on the NASDAQ and that PDDH is the indirect parent company of Whaleco. Defendant affirmatively states that PDDH does not operate

either Temu or the Pinduoduo e-commerce marketplace. Defendant further affirmatively states that it is a holding company with no material operations of its own. With respect to the photo embedded in Paragraph 6, Defendant is without sufficient knowledge or information to admit or deny the origin, authenticity, date, source, or completeness of the information contained in the photo, and therefore denies same. Defendant denies the remaining allegations contained in Paragraph 6.

7. With respect to the source cited in Footnotes 1 and 2, Defendant admits the article contains the quoted language; however, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnotes 1 and 2 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant admits that the Temu app is popular throughout the United States and that Temu advertisements aired during the 2024 Super Bowl. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 7.

8. With respect to the sources cited in Footnotes 3 and 4, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 3 and 4 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant admits that the Temu app is widely downloaded but is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 8. Defendant affirmatively states that it is a holding company with no material operations of its own and it does not operate the Temu marketplace.

9. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 9 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

10. With respect to the sources cited in Footnotes 5 and 6, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. Defendant also denies the State's characterization of same because they do *not* say the Temu app was suspended from the Apple App Store. To the extent the State attempts to use the sources cited in Footnotes 5 and 6 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 10 and therefore denies same, except Defendant admits that the Pinduoduo app was suspended by Google in 2023. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

11. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 11 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app.

12. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is

further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 12 and therefore denies same. Defendant affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

13. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 13 and therefore denies same. Defendant affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

14. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 14 and therefore denies same.

15. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 15 and therefore denies same.

16. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 16 and therefore denies same.

17. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in

Paragraph 17 and therefore denies same.

18. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 18 and therefore denies same.

19. Paragraph 19 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 19. Defendant affirmatively states that Whaleco, which operates the Temu marketplace in the United States, is a wholly owned indirect subsidiary of PDDH, and PDDH is a holding company incorporated in the Cayman Islands that maintains its principal executive offices in Dublin, Ireland.

20. Defendant denies that it has sought to improperly collect PII or has employed unfair or deceptive trade practices. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace. Defendant is further without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 20 and therefore denies same.

21. Defendant denies the allegations contained in Paragraph 21 and further denies that the State is entitled to or has shown a need for a court order related to any discovery matter.

22. Defendant admits that the Attorney General purports to bring this action on behalf of the State of Arkansas on the grounds described in Paragraph 22. The remaining allegations of Paragraph 22 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 22.

23. With respect to the source cited in Footnote 7, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or

completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 7 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant denies the allegations contained in Paragraph 23 as stated, except that Defendant admits that it is listed on the NASDAQ. Defendant affirmatively states that PDDH is a holding company incorporated in the Cayman Islands that maintains its principal executive offices in Dublin, Ireland; that its principal executive offices were previously located in Shanghai, China; that it is a holding company with no material operations of its own; that it does not operate either the Temu marketplace or the Pinduoduo app; that it is the indirect parent company of Whaleco, which operates the Temu marketplace in the United States; and that it is the parent and indirect parent company of several other businesses, some of which operate in China.

24. Defendant admits the allegations contained in Sentence 1 of Paragraph 24. Defendant denies the allegations contained in Sentence 2 of Paragraph 24.

25. Paragraph 25 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 25.

26. Defendant affirmatively states that PDDH is the indirect parent company of Whaleco, which operates the Temu marketplace in the United States. Defendant denies the remaining allegations contained in Paragraph 26.

27. Defendant denies the allegations contained in Paragraph 27.

28. Defendant affirmatively states that PDDH is the indirect parent company of Whaleco. Defendant denies the remaining allegations contained in Paragraph 28.

29. Paragraph 29 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 29.

30. Paragraph 30 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 30.

31. Paragraph 31 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 31.

32. Sentence 1 of Paragraph 32 contains legal conclusions for which no response is required, and which is therefore denied. Defendant affirmatively states that it is a holding company with no material operations of its own. Defendant denies the remaining allegations in Paragraph 32 as to itself and is without sufficient knowledge or information to admit or deny as to Whaleco and therefore denies same.

33. With respect to the photos embedded in Paragraph 33, Defendant is without sufficient knowledge or information to admit or deny the origin, authenticity, date, source, or completeness of the information contained in the photos, and therefore denies same. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 33 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

34. Paragraph 34 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 34.

35. Paragraph 35 contains legal conclusions for which no response is required, and which are therefore denied. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace. To the extent a response is required, Defendant denies the allegations contained in Paragraph 35 as to itself and is without sufficient knowledge or information to admit or deny as to Whaleco and therefore denies

same.

36. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 36 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

37. Defendant admits the allegations contained in Paragraph 37.

38. Paragraph 38 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 38.

39. Paragraph 39 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 39.

40. Defendant admits that Colin Huang founded what ultimately became PDD Holdings Inc., that Mr. Huang started his career at Google as a software engineer and project manager, and that PDDH reported a gross merchandise value of approximately \$383 billion for 2021. Defendant denies the remaining allegations contained in Paragraph 40. Defendant affirmatively states that it is a holding company with no material operations of its own.

41. Defendant denies that it operates Pinduoduo but admits that Pinduoduo offers consumer products across a broad spectrum of categories. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

42. Defendant states that the SEC filing cited in Footnote 8 speaks for itself and denies any allegations contained in Paragraph 42 that are inconsistent therewith. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in

Paragraph 42 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

43. With respect to the source cited in Footnote 9, Defendant admits that the source contains the information cited; however, Defendant is without sufficient knowledge or information to admit or deny the authenticity, accuracy, source, or completeness of the information contained therein, and therefore Defendant denies same. To the extent the State attempts to use the source cited in Footnote 9 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 43 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

44. Defendant denies the allegations contained in Paragraph 44, except Defendant admits that it maintains its principal executive offices in Dublin, Ireland, that those offices were previously in Shanghai, China, and that it owns subsidiary companies that operate in China. Defendant affirmatively states that it is a holding company with no material operations of its own.

45. With respect to the sources cited in Footnotes 10 and 11, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 10 and 11 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant admits that the Pinduoduo app was suspended by Google in 2023,

but is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 45 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

46. With respect to the source cited in Footnote 12, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 12 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 46 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

47. With respect to the source cited in Footnote 13, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 13 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 47 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

48. With respect to the source cited in Footnotes 14 and 15, Defendant is without

sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnotes 14 and 15 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 48 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

49. With respect to the source cited in Footnote 16, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 16 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 49 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

50. With respect to the source cited in Footnote 17, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 17 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required,

Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 50 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

51. Defendant incorporates herein its responses to Paragraphs 111 through 116, *infra*. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 51 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

52. With respect to the source cited in Footnote 18, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 18 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 52 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

53. With respect to the source cited in Footnote 19, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 19 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required,

Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 53 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

54. With respect to the source cited in Footnote 20, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 20 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 54 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

55. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 55 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

56. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 56 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

57. With respect to the source cited in Footnote 21, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or

completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 21 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 57 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

58. With respect to the source cited in Footnote 22, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 58 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

59. With respect to the source cited in Footnote 23, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 59 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

60. Defendant states that the source cited in Footnote 24 speaks for itself and denies any allegations contained in Paragraph 60 that are inconsistent therewith. To the extent further response is required, Defendant admits that the Temu app was launched in 2022 in the United States and that the United States is one of the markets of the Temu app. Defendant denies the remaining allegations contained in Paragraph 60. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

61. Defendant denies the allegations contained in Paragraph 61. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

62. With respect to the source cited in Footnote 25, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 25 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny any remaining allegations contained in Paragraph 62 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app.

63. With respect to the source cited in Footnote 26, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 26 to support any allegations of wrongdoing on

Defendant's behalf, Defendant denies the allegations. To the extent further response is required, Defendant is without sufficient knowledge or information to admit or deny any remaining allegations contained in Paragraph 63 and therefore denies same, except Defendant admits that Temu provides a marketplace for sellers, including sellers based in China, to offer their products. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

64. With respect to the sources cited in Footnotes 27 and 28, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 27 and 28 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant admits that the Temu app has experienced growth since its launch. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu app. Defendant denies the remaining allegations contained in Paragraph 64.

65. With respect to the source cited in Footnote 29, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 29 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny any remaining allegations contained in Paragraph 65 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

66. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 66 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

67. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 67 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

68. With respect to the source cited in Footnote 30, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 30 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 68 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app.

69. With respect to the source cited in Footnote 31, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 31 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge

or information to admit or deny the remaining allegations contained in Paragraph 69 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app.

70. Defendant agrees that this case is not about the Pinduoduo app and affirmatively states that allegations related to the Pinduoduo app are irrelevant to this lawsuit. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 70 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

71. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 71 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

72. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 72 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

73. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained

in Paragraph 73 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

74. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 74 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

75. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 75 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

76. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 76 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

77. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 77 and therefore denies same. Defendant affirmatively states that it is a holding

company with no material operations of its own, and it does not operate the Temu marketplace.

78. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant further denies that the State is entitled to or has shown a need for a court order related to any discovery matter. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 78 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

79. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. To the extent Paragraph 79 contains a legal conclusion, no response is required. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 79 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

80. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 80 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

81. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 81 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

82. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 82 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

83. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 83 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

84. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 84 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

85. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 85 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

86. Defendant incorporates herein its responses to Paragraph 114, *infra*. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 86 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

87. Defendant is without sufficient knowledge or information to admit or deny the

allegations in Paragraph 87 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

88. With respect to the source cited in Footnotes 32, 33, and 34, Defendant is without sufficient knowledge or information to admit or deny the completeness or accuracy of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnotes 32, 33, and 34 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant states that the remainder of Paragraph 88 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 88.

89. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 89 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

90. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 90 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

91. Defendant incorporates herein its responses to Paragraphs 117 through 122, *infra*. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 91 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

92. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 92 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

93. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 93 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

94. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 94 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

95. Defendant states that Paragraph 95 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 95.

96. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 96 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

97. With respect to the source cited in Footnote 35, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 35 to support any allegations of wrongdoing on

Defendant's behalf, Defendant denies the allegations. Defendant states that Paragraph 97 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies any remaining allegations contained in Paragraph 97 and further denies any suggestion of wrongdoing.

98. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 98 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

99. With respect to the source cited in Footnote 36, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 36 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. The remainder of Paragraph 99 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 99.

100. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 100 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

101. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 101 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu

marketplace.

102. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 102 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

103. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 103 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate either the Temu marketplace or the Pinduoduo app. Defendant further affirmatively states that any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

104. Defendant admits that the Temu app may use network connectivity. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 104 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

105. Defendant states that Paragraph 105 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 105.

106. Defendant states that Paragraph 106 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 106.

107. Defendant states that Paragraph 107 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 107.

108. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 108 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

109. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 109 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

110. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 110 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

111. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 111 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant

to this lawsuit.

112. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 112 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

113. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 113 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

114. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 114 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

115. Defendant is without sufficient knowledge or information to admit or deny

allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 115 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

116. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 116 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

117. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 117 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

118. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 118 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

119. Defendant incorporates fully herein its responses to Paragraphs 120 through 122 and 139 through 143, *infra*. To the extent further response is required, Defendant denies the allegations in Paragraph 119.

120. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 120 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

121. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 121 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

122. With respect to the source cited in Footnote 37, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 37 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant further states that Paragraph 122 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 122.

123. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 123 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace. Defendant further incorporates its responses to Paragraphs 144 through 149, *infra*, as if set forth fully herein.

124. With respect to the source cited in Footnote 38, Defendant is without sufficient

knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 124 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

125. Defendant states that the Footnote 39 contains no factual allegations directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 125 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

126. Defendant is without sufficient knowledge or information to admit or deny the allegations contained in Paragraph 126 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, that it does not operate either the Temu marketplace or the Pinduoduo app, and any allegations related to the Pinduoduo app are irrelevant to this lawsuit.

127. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 127 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace. Defendant further incorporates its responses to Paragraphs 94 through 100, *supra*, as if set forth fully herein.

128. With respect to the source cited in Footnote 40, Defendant is without sufficient

knowledge or information to admit or deny the completeness or accuracy of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 40 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant further states that Paragraph 128 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 128.

129. Defendant states that Paragraph 129 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 129.

130. With respect to the source cited in Footnote 41, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 41 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant further states that Paragraph 130 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 130.

131. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 131 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

132. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 132 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu

marketplace.

133. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 133 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

134. Defendant is without sufficient knowledge or information to admit or deny allegations related to the State's alleged investigation and therefore denies same. Defendant incorporates fully herein its responses to Paragraphs 48 and 49, *supra*, in response to Footnote 42. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 134 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

135. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 135 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

136. With respect to the source cited in Footnote 43, Defendant is without sufficient knowledge or information to admit or deny the completeness or accuracy of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 43 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Additionally, Defendant is without sufficient knowledge or information related to the State's investigation to admit or deny and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 136 and

therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

137. With respect to the source cited in Footnote 44, Defendant is without sufficient knowledge or information to admit or deny the completeness or accuracy of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 44 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. The remainder of Paragraph 137 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 137.

138. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 138 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

139. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 139 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

140. Defendant states that Paragraph 140 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 140.

141. Defendant states that Paragraph 141 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 141.

142. With respect to Footnote 45, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 45 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant states that Paragraph 142 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 142.

143. Defendant states that Paragraph 143 does not contain any factual allegation directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 143.

144. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 144 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

145. With respect to Footnote 46 and/or 58, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 46 and/or 58 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 145 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

146. Defendant denies the allegations contained in Paragraph 146 on its own behalf.

Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

147. Defendant admits that the sources cited in Footnotes 46 and 47 contain some of the quoted language in the chart following Paragraph 147. Defendant denies the State's characterization of the referenced materials and further denies any suggestion of wrongdoing. Additionally, Defendant further states that Temu's Privacy Policy cited in Footnotes 46 and 47 speaks for itself and denies any allegations contained in the chart or Paragraph 147 that are inconsistent therewith. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 147 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

148. To the extent Paragraph 148 purports to characterize the Private Notice Addendum to US Resident, the Addendum speaks for itself. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 148 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

149. Defendant affirmatively states that the source cited in Footnote 48 speaks for itself and denies any characterization or allegation contained in Paragraph 149 or the following chart that is inconsistent therewith. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 149 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

150. Paragraph 150 contains legal conclusions for which no response is required. To the

extent Paragraph 150 contains any allegations directed at Defendant, Defendant denies the allegations and further denies any suggestion of wrongdoing.

151. Defendant denies the allegations in Paragraph 151 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

152. Defendant denies the allegations in Paragraph 152 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

153. With respect to the source cited in Footnote 49, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 49 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant denies the allegations in Paragraph 153 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

154. Defendant states that Paragraph 154 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 154. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

155. Defendant states that Paragraph 155 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 155 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

156. Paragraph 156 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 156.

157. Paragraph 157 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 157.

158. With respect to the sources cited in Footnote 50, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnote 50 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 158 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 158.

159. With respect to the source cited in Footnote 51, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 51 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 159 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 159.

160. With respect to the source cited in Footnote 52, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 52 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 160 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 160.

161. With respect to the source cited in Footnote 53, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 53 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 161 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 161.

162. With respect to the source cited in Footnote 54, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 54 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 162 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 162.

163. With respect to the source cited in Footnote 55, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 55 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 163 contains legal conclusions for which no response is required.

To the extent a response is required, Defendant denies the allegations contained in Paragraph 163.

164. With respect to the source cited in Footnote 56, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 56 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 164 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 164.

165. With respect to the source cited in Footnote 57, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 57 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 165 contains legal conclusions for which no response is required, or alternatively contains no factual allegations directed at Defendant that would require a response. To the extent a response is required, Defendant denies the allegations contained in Paragraph 165.

166. Paragraph 166 contains legal conclusions for which no response is required. Further, the allegations in Paragraph 166 are not directed at Defendant and therefore do not require a response. To the extent a response is required, Defendant denies the allegations contained in Paragraph 166.

167. With respect to the source cited in Footnote 58, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 58 to support any allegations of wrongdoing on

Defendant's behalf, Defendant denies the allegations. Paragraph 167 contains legal conclusions for which no response is required, or alternatively contains no factual allegations directed at Defendant that would require a response. To the extent a response is required, Defendant denies the allegations contained in Paragraph 167.

168. With respect to the source cited in Footnote 59, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 59 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 168 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 168.

169. With respect to the source cited in Footnote 60, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 60 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 169 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 169.

170. With respect to the source cited in Footnote 61, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 61 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 170 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 170.

171. Defendant states that no source is cited for the quoted language, and as a result, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained in Paragraph 171 and therefore denies same. Paragraph 171 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 171.

172. With respect to the source cited in Footnote 62, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 62 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 172 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 172.

173. With respect to the source cited in Footnote 63, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 63 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 173 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 173.

174. With respect to the sources cited in Footnote 64, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnote 64 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 174 contains legal conclusions

for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 174.

175. With respect to the sources cited in Footnote 65, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 65 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 175 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 175.

176. With respect to the sources cited in Footnotes 66, 67, 68, and 69, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 66, 67, 68, and 69 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant states that Paragraph 176 does not contain any factual allegation directed at Defendant, and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 176.

177. With respect to the source cited in Footnote 70, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 70 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 177 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 177.

178. With respect to the source cited in Footnote 71, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 71 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 178 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 178.

179. With respect to the source cited in Footnote 72, Defendant is without sufficient knowledge or information to admit or deny the accuracy of or completeness of the information contained therein and therefore denies same. To the extent the State attempts to use the source cited in Footnote 72 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 179 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 179.

180. With respect to the sources cited in Footnotes 73 and 74, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 73 and 74 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Paragraph 180 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 180.

181. With respect to the sources cited in Footnote 75, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 75 to support any allegations of wrongdoing on

Defendant's behalf, Defendant denies the allegations. Paragraph 181 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 181.

182. Paragraph 182 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 182.

183. Paragraph 183 contains legal conclusions for which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 183.

184. Defendant denies the allegations contained in Paragraph 184.

185. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 185 that are inconsistent therewith. Defendant denies the remaining allegations in Paragraph 185 and denies any suggestion of wrongdoing.

186. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 186 that are inconsistent therewith.

187. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 187 that are inconsistent therewith.

188. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 188 that are inconsistent therewith.

189. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 189 that are inconsistent therewith.

190. Defendant states that the referenced SEC filings speak for themselves and denies any allegations contained in Paragraph 190 that are inconsistent therewith.

191. Defendant denies the allegations contained in Paragraph 191. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does

not operate the Temu marketplace.

192. Defendant denies the allegations in Paragraph 192 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

193. Defendant denies the allegations in Paragraph 193 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

194. Defendant denies the allegations in Paragraph 194 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

195. With respect to the sources cited in Footnotes 78 and 79, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. Defendant is also without sufficient knowledge or information to admit or deny the allegations regarding what unnamed “[o]thers have observed,” and therefore denies same. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 195 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

196. With respect to the source cited in Footnote 80, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or

completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 80 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations, and further denies the source's characterization and the State's characterization of the character and ad. Defendant admits that Whaleco ran advertisements during the 2024 Super Bowl, and that those advertisements speak for themselves. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 196 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

197. With respect to the screenshot embedded in Paragraph 197, Defendant denies the State's characterization of the advertisement, photo, and character, and denies any suggestion of wrongdoing related to same. Defendant denies the allegations in Paragraph 197 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

198. With respect to the source cited in Footnote 81, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 81 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant admits that Congress sent a letter to Whaleco regarding Temu's data-collection practices. Defendant denies any remaining allegations contained in Paragraph 198. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

199. Defendant denies the allegations in Paragraph 199 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

200. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 200 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

201. With respect to the source cited in Footnote 82, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 82 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations and affirmatively states that the quote does not come from the source cited; instead, the quote comes from the Grizzly Report. Defendant denies the allegations in Paragraph 201 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

202. With respect to the photo embedded in Paragraph 202, Defendant is without sufficient knowledge or information to admit or deny the origin, authenticity, date, source, or completeness of the information contained in the photo, and therefore denies same. Defendant admits that Temu is committed to offering quality products at attractive prices and utilizes certain mechanisms within the app. Defendant denies the remaining allegations in Paragraph 202 on its

own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

203. With respect to the source cited in Footnote 83, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 83 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations and affirmatively states that the quote does not come from the source cited; instead, the quote comes from the Grizzly Report. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 203 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

204. Defendant denies the allegations in Paragraph 204 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

205. With respect to the source cited in Footnote 85, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 85 to support allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant denies the allegations in Paragraph 205 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that

it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

206. With respect to the sources cited in Footnote 86, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 86 to support allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. With respect to the source cited in Footnote 87, Defendant affirmatively states that the attributed quotes are misquoted and misrepresented. Defendant affirmatively states that no source was provided in Footnote 88. Defendant denies the remaining allegations in Paragraph 206 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

207. Defendant denies the allegations in Paragraph 207 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

208. Defendant is without sufficient knowledge or information to admit or deny the allegations in the first sentence of Paragraph 208 of the Amended and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace. Defendant states that the remainder of Paragraph 208 contains no factual allegations directed at Defendant and therefore no response is required. To the extent a response is required, Defendant denies the allegations in Paragraph 208.

209. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 209 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

210. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 210 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

211. With respect to the source cited in Footnote 89 and the photo embedded in Paragraph 211, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 89 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Footnote 90 and Paragraph 211 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

212. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 212 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

213. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 213 and therefore denies same. Defendant affirmatively states that it is a

holding company with no material operations of its own, and it does not operate the Temu marketplace.

214. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 214 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

215. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 215 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

216. Defendant denies the allegations in Paragraph 216 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

217. With respect to the source cited in Footnote 91, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. And, to the extent the State attempts to use the source cited in Footnote 91 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant denies the allegations in Paragraph 217 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

218. With respect to the source cited in Footnote 92, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 92 as support for any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations and affirmatively states that the quote does not come from the source cited; instead, the quote comes from the Grizzly Report. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations contained in Paragraph 218 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

219. With respect to the sources cited in Footnotes 93 and 94, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the sources cited in Footnotes 93 or 94 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant further affirmatively states the text accompanying Footnote 93 contains quotes that do not appear in the cited article. Defendant denies the remaining allegations contained in Paragraph 219 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

220. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 220 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu

marketplace.

221. With respect to the source cited in Footnote 95, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 95 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant denies the remaining allegations contained in Paragraph 221 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

222. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 222 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

223. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 223 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

224. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 224 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

225. With respect to the source cited in Footnote 96, Defendant is without sufficient

knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 96 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 225 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

226. With respect to the source cited in Footnote 97, Defendant is without sufficient knowledge or information to admit or deny the authenticity of, source of, accuracy of, or completeness of the information contained therein, and therefore denies same. To the extent the State attempts to use the source cited in Footnote 97 to support any allegations of wrongdoing on Defendant's behalf, Defendant denies the allegations. Defendant is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 226 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

227. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 227 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

228. Defendant is without sufficient knowledge or information to admit or deny the allegations in Paragraph 228 and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

229. Defendant denies the allegations in Paragraph 229 on its own behalf and is without sufficient knowledge or information to admit or deny the allegations as to Whaleco and therefore denies same. Defendant affirmatively states that it is a holding company with no material operations of its own, and it does not operate the Temu marketplace.

230. Defendant incorporates its responses to each allegation contained in the preceding paragraphs as if fully set forth herein.

231. The allegations of Paragraph 231 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 231.

232. The allegations of Paragraph 232 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 232.

233. Defendant denies the allegations contained in Paragraph 233.

234. The allegations of Paragraph 234(a), (b), (c), and (d) are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 234(a), (b), (c), and (d).

235. Defendant denies the allegations contained in Paragraph 235.

236. Defendant denies the allegations contained in Paragraph 236.

237. Defendant denies the allegations contained in Paragraph 237.

238. Defendant incorporates its responses to each allegation contained in the preceding paragraphs as if fully set forth herein.

239. The allegations of Paragraph 239 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in

Paragraph 239.

240. The allegations of Paragraph 240 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 240.

241. Defendant denies the allegations contained in Paragraph 241.

242. The allegations of Paragraph 242(a) and (b) are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 242(a) and (b).

243. Defendant denies the allegations contained in Paragraph 243.

244. Defendant denies the allegations contained in Paragraph 244.

245. Defendant denies the allegations contained in Paragraph 245.

246. Defendant incorporates its responses to each allegation contained in the preceding paragraphs as if fully set forth herein.

247. The allegations of Paragraph 247 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 247.

248. The allegations of Paragraph 248 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 248.

249. Defendant denies the allegations contained in Paragraph 249.

250. The allegations of Paragraph 250(a), (b), (c), and (d) are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 250(a), (b), (c), and (d).

251. Defendant denies the allegations contained in Paragraph 251.

252. Defendant incorporates its responses to each allegation contained in the preceding paragraphs as if fully set forth herein.

253. The allegations of Paragraph 253 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 253.

254. The allegations of Paragraph 254 are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 254.

255. Defendant denies the allegations contained in Paragraph 255.

256. The allegations of Paragraph 256(a) and (b) are conclusions of law to which no response is required. To the extent a response is required, Defendant denies the allegations contained in Paragraph 256(a) and (b).

257. Defendant denies the allegations contained in Paragraph 257.

258. Defendant denies the allegations contained in Paragraph 258.

259. Defendant denies the allegations contained in Paragraph 259 and denies that the State is entitled to the relief requested or to any relief whatsoever.

260. Defendant denies the allegations contained in Paragraph 260 and denies that the State is entitled to the relief requested or to any relief whatsoever.

261. Defendant denies the allegations contained in Paragraph 261 and denies that the State is entitled to the relief requested or to any relief whatsoever.

262. Defendant incorporates its responses to each allegation contained in the preceding paragraphs as if fully set forth herein.

263. Defendant denies that the State has the authority to bring this unjust enrichment claim pursuant to any authority, and specifically denies the State has the authority to bring this claim *parens patriae*.

264. Defendant denies the allegations contained in Paragraph 264.

265. Defendant denies the allegations contained in Paragraph 265.

266. Defendant denies the allegations contained in Paragraph 266.

267. Defendant denies the allegations contained in Paragraph 267.

268. Defendant denies the allegations contained in Paragraph 268.

269. Defendant denies the allegations contained in Paragraph 269.

270. Defendant denies the allegations contained in Paragraph 270 and denies that the State is entitled to the relief requested or to any relief whatsoever.

271. Defendant also requests a trial by jury on any claims so triable.

272. Defendant denies the allegations contained in Paragraph 272 and denies that the State is entitled to any of the relief requested or to any relief whatsoever.

AFFIRMATIVE DEFENSES

Without assuming any burden of proof that Defendant would not otherwise bear and reserving the right to amend its Answer to assert additional defenses and/or affirmative defenses as they may become known during discovery, Defendant asserts the following defenses and/or affirmative defenses:

1. The State's Amended Complaint should be dismissed for failure to state facts upon which relief can be granted pursuant to Arkansas Rule of Civil Procedure 12(b)(6).

2. The State's claims are barred, in whole or in part, because the State lacks standing to assert some or all of the causes of action and to obtain some or all of the requested relief.

3. The State's claims are barred, in whole or in part, to the extent the Amended Complaint fails to allege a justiciable controversy.

4. The State's claims are barred, in whole or in part, because the damages and other monetary relief sought by the State are speculative, remote, and/or impossible to ascertain.

5. The State's claims must fail, in whole or in part, because they are based on nonactionable statements of puffery, hyperbole, subjective statements, or opinion rather than statements of fact.

6. The State's claims are barred, in whole or in part, because the Amended Complaint fails to allege facts showing that consumers relied on the alleged representations, misrepresentations, or omissions.

7. Some or all of the State's Arkansas Deceptive Trade Practices Act ("ADTPA") claims must fail because Temu is not a "good" or a "service" as defined by the ADTPA.

8. The State's claims are barred or limited, in whole or in part, by federal and/or state law, including but not limited to: Section 230 of the Communications Decency Act of 1996; the Due Process Clauses of the United States and Arkansas Constitutions; the Equal Protection Clause of the United States Constitution and similar clauses of the Arkansas Constitution, including, without limitation Article 2 Sections 3 and 18; the First Amendment of the United States Constitution and similar clauses of the Arkansas Constitution, including, without limitation Article 2 Section 6; the Dormant Commerce Clause; the Dormant Foreign Commerce Clause; the political question doctrine; the foreign affairs doctrine; the act of state doctrine; the international comity doctrine; and the separation of powers doctrine.

9. The State's claims are barred, in whole or in part, because the ADTPA does not apply to "persons engaging in the dissemination of information who do not have actual knowledge

of the intent, design, purpose, or deceptive nature of the advertising or practice.” Ark. Code § 4-88-101(2).

10. The State’s claims are expressly or impliedly preempted, in whole or in part, by federal or state law.

11. The State’s claims are barred, in whole or in part, because the Amended Complaint fails to allege facts showing the existence of a sufficient nexus with Arkansas.

12. The State’s claims are barred, in whole or in part, because to the extent Defendant engaged in any of the alleged acts, omissions, or conduct, it did so with justification.

13. The State’s claims are barred or limited by any applicable judgment, including by operation of the doctrines of res judicata and collateral estoppel, failure to fulfill conditions precedent, payment, accord and satisfaction, and compromise and settlement.

14. The State’s equitable claims are barred, in whole or in part, because the State has an adequate remedy at law, because the State has no factual or legal basis for the grant of equitable relief, and because the State’s requested equitable relief would duplicate legal remedies.

15. The State’s claims are barred, in whole or in part, by the doctrines of laches, waiver, acquiescence, unclean hands, estoppel, and/or ratification.

16. The State’s claims should fail because the State would be unjustly enriched if allowed to recover on any of its claims.

17. The State’s claims for relief are barred, in whole or in part, based on the principles of equity. Several facts would render the imposition of injunctive relief, civil penalties, or other remedies inequitable here, including but not limited to Defendant’s good-faith reliance on state and federal guidance, the absence of any wrongful or unlawful conduct, the lack of an adequate

investigation prior to the filing of the Complaint and Amended Complaint, and the course of the State's investigation and pursuit of these claims.

18. The State's claims for relief are barred, in whole or in part, by Defendant's compliance with all applicable laws underlying the State's claims.

19. The State's claims for relief are barred, in whole or in part, because to the extent any of the relief sought is warranted (which Defendant expressly denies), the relief belongs to individual Arkansans and not to the State.

20. The State's claims for relief are barred, in whole or in part, to the extent individual Arkansans recover, could recover, or have recovered any alleged damages for the same conduct.

21. The State's claims are barred because the State is not the real party in interest.

22. The State's claims are subject to all defenses that could be asserted if the State's claims were properly made by those on whose behalf the State seeks to recover.

23. The State's claims are barred, in whole or in part, because to the extent Defendant engaged in any wrongful conduct, such conduct was not willful.

24. The State's claims are barred, in whole or in part, because Temu users consented to the conduct alleged to be wrongful.

25. The State's claims are barred, in whole or in part, because the State cannot show that Defendant had the requisite intent.

26. The State's claims are barred on the ground and to the extent that the Arkansas consumers that the State purports to represent enjoyed the full benefit of their purchase of the products that are the subject of the State's "commercial claims."

27. The State's claims are barred, in whole or in part, because, to the extent Defendant previously engaged in allegedly offending conduct or practice (which Defendant expressly

denies), that has ceased and Defendant has cured or taken sufficient corrective action in regard to the alleged defects of which the State complains.

28. The State cannot obtain relief on its claims based on the actions undertaken by Defendant of which Defendant provided notice of all reasonable facts, including notice provided through Temu's Terms of Use and Privacy Policy.

29. The State's claims are barred, in whole or in part, by applicable limitations of liability in the Terms of Use agreed to by users.

30. The State's claims are barred in whole or in part because the State admitted that it brought these claims with no evidence that Defendant has actually provided any Arkansans' data to the Chinese government. *See* 2026-03-05 Hr'g. Tr. 89:16-90:4.

31. The State's claims for civil penalties are barred or reduced by applicable law or statute or, in the alternative, are unconstitutional insofar as they violate the due process protections afforded by the United States Constitution, the excessive fines clause of the Eighth Amendment of the United States Constitution, the Full Faith and Credit Clause of the United States Constitution, and applicable provisions of the Constitution of this State or that of any other state whose laws may apply. Any law, statute, or other authority purporting to permit the recovery of civil penalties in this case is unconstitutional, facially and as applied, to the extent that, without limitation, it: (i) lacks constitutionally sufficient standards to guide and restrain discretion in determining whether to award civil penalties and/or the amount, if any; (ii) is void for vagueness because, among other reasons, it fails to provide adequate notice as to what conduct will result in civil penalties; (iii) unconstitutionally may permit recovery of civil penalties based on harms to third parties, out-of-state conduct, conduct that complied with applicable law, or conduct that was not directed, or did not proximately cause harm, to the State; (iv) unconstitutionally may permit

recovery of civil penalties in an amount that is not both reasonable and proportionate to the amount of harm, if any, to the State; (v) unconstitutionally may permit consideration of net worth or other financial information relating to Defendant; (vi) lacks constitutionally sufficient standards to be applied by the trial court in evaluating any award of civil penalties; (vii) lacks constitutionally sufficient standards for appellate review of any award of civil penalties; (viii) would unconstitutionally impose a penalty, criminal in nature, without according to Defendant the same procedural protections that are accorded to criminal defendants under the constitutions of the United States or this State; and (ix) otherwise fails to satisfy legal precedent.

32. To the extent the Amended Complaint can be read to contain a request for punitive damages, Defendant affirmatively pleads that such a claim cannot be sustained because the State fails to allege facts sufficient to justify such damages and because an award of punitive damages under Arkansas law does not provide constitutionally adequate standards of sufficient clarity for determining the appropriate imposition of, and the appropriate size of, a punitive damages award.

33. The State's claims for relief are barred, in whole or in part, because the remedies sought are contrary to public policy, otherwise unauthorized, or not recognized by applicable law.

34. The State's claims are barred, reduced, and limited pursuant to the doctrines of recoupment and setoff.

35. The State's claims are barred, in whole or in part, because to the extent the State has sustained cognizable injuries or losses (which Defendant expressly denies), they were the result of intervening or superseding proximate causes, events, factors, occurrences, or conditions, which were not reasonably foreseeable and not caused by Defendant and for which Defendant is not liable.

36. The State's claims are barred, in whole or in part, because PDDH cannot be held responsible for the intervening acts of independent sellers and other third parties who transact through the Temu marketplace.

37. The State's claims are barred, in whole or in part, because the alleged injuries are too remote from the alleged conduct of Defendant to provide a basis for liability as a matter of law, including due process.

38. The State's claims are barred, in whole or in part, because any and all damages alleged by the State were caused by third parties over whom Defendant had no control and for whom Defendant was not responsible.

39. The State's requests for injunctive relief are barred, in whole or in part, as moot.

40. Defendant asserts its right to a complete bar or proportionate reduction of any award found against Defendant based on the negligence, fault, or other conduct of any responsible or necessary or indispensable third party not made a party in this action.

41. Defendant asserts its right to any indemnity or contribution provided for by law.

42. Defendant reserves the right to plead further and reserves defenses and objections on the basis of lack of personal jurisdiction, lack of subject-matter jurisdiction, improper venue, insufficient process, insufficient service of process, failure to join a party under Rule 19, pendency of another action between the same parties arising out of the same transaction or occurrence, and the affirmative defenses listed in Rule 8(c) of the Arkansas Rules of Civil Procedure, including but not limited to, accord and satisfaction, arbitration and award, contributory negligence, duress, estoppel, failure of consideration, fraud, illegality, laches, license, payment, release, res judicata, statute of frauds, statute of limitations, waiver, and any other matter constituting an avoidance or affirmative defense. Defendant reserves its right to assert counterclaims and/or third-party

complaints. Defendant reserves the right to amend its Answer as necessary should it later discover facts demonstrating the existence of additional affirmative defenses.

PRAYER

WHEREFORE, Defendant prays for the following relief:

- A. That Plaintiff takes nothing by reason of its Amended Complaint;
- B. That the requests for declaratory and/or equitable relief be denied;
- C. That judgment on each cause of action be rendered in favor of Defendant;
- D. That Defendant be awarded costs and expenses incurred in defense of this action, including reasonable attorneys' fees; and
- E. For such other and/or further relief as this Court may deem just and proper.

Respectfully submitted,



Marshall S. Ney, Ark. Bar No. 91108
Katherine C. Campbell, Ark. Bar No. 2013241
FRIDAY, ELDREDGE & CLARK, LLP
3350 S. Pinnacle Hills Parkway, Suite 301
Rogers, AR 72758
Office: (479) 695-6049
Facsimile: (501) 244-5389
mney@fridayfirm.com
kcampbell@fridayfirm.com

Kevin A. Crass, Ark. Bar No. 84029
FRIDAY, ELDREDGE & CLARK, LLP
400 W Capitol Avenue, Suite 2000
Little Rock, AR 72201
Office: (501) 370-1592
crass@fridayfirm.com

Christopher Chorba (*pro hac vice*)
Jacob U. Arber (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
Los Angeles, CA 90071
Telephone: (213) 229-7000
Facsimile: (213) 229-7520
cchorba@gibsondunn.com
jarber@gibsondunn.com

CERTIFICATE OF SERVICE

I, Katherine C. Campbell, do hereby certify that a true and correct copy of the foregoing was served on all counsel of record via the Court's electronic filing system on or about this 28th day of August 2026:


Katherine C. Campbell