

Case No.: 3:25-cv-05110-KKE

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

NATHEN BARTON,

Plaintiff
v.

Anthony George, AG Marketing LLC,
Discount and Savings Advantage, My
Retail Savings, Secured ID LLC, ID
Integrity LLC, Practical I.D. Protection
LLC, MK TELE-VISIT, My Retail
Savings, Oneperk Place, Pro Identity Save,
SMART, Telehealth4U, Financial
Achiever Pro, All Purpose Docs, Dragons
Fly Online LLC, AutoSaver365.com, My
Family Telemed, My ID Theft Protection,
Hyper Fox Enterprises LLC, ID Core
Protection LLC,
and John Doe 1-10

Case No.: 3:25-cv-05110-KKE

DECLARATION OF
NATHEN BARTON IN SUPPORT
OF MOTION

1 My name is Nathen Barton and I live at 4618 NW 11th Cir, Camas WA 98607. I am over the age
2 of eighteen, and otherwise competent to be a witness in this matter. Except as expressly set forth
3 herein, I make this declaration in my personal capacity and based on my personal knowledge.

- 4 1. Exhibit A is a true and accurate copy of a letter I received in the mail on or about March 5,
5 2025.
- 6 2. It is the only correspondence I have received from Mr. George or AG Marketing LLC in
7 after this lawsuit was filed.

8
9 I declare under penalty of perjury under the laws of the State of Washington that the foregoing
10 statements are true and correct.

11
12 

13 _____
14 Signed by Nathen Barton

March 24, 2025

Date

Signed in Camas Washington
Clark County

**IN THE UNITED STATES DISTRICT COURT OF WESTERN DIVISION OF
WASHINGTON**

Nathen Barton,
Plaintiff,

v.

Anthony George,
Defendant.

Case No. 3:25-cv-05110-KKE

Defendant, Anthony George, hereby submits this Answer to the Complaint filed by Plaintiff, Nathen Barton, and respectfully alleges as follows:

1. Defendant denies any liability to Plaintiff regarding the allegations that AG Marketing that called your client.

We do not place outbound calls for ourselves, partners, or clients. We strictly take inbound calls.

We recommend you look up who owns the actual "phone number" that placed calls to your client. In your discovery, you will determine that AG Marketing does not own or utilize the number(s) that called your client. Whoever owns the number that is placing calls to your client is the entity you should be contacting with the lawsuit.

2. Defendant asserts that Plaintiff's Complaint fails to state a claim upon which relief may be granted, and, therefore, the case should be dismissed.

Respectfully submitted,

Anthony George

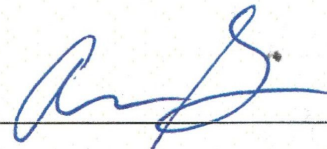
By: AG Marketing

2655 Ulmerton Road Ste. 121 Clearwater, FL 33762

888-339-6817

anthony@agmarketingflorida.com

Date: 03/04/2025



Anthony George