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10 Attorneys for Plaintiff
11 FEDERAL TRADE COMMISSION

12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 FEDERAL TRADE COMMISSION,

14 Plaintiff,

15 v.

16 AWS, LLC, a Nevada limited liability company;
ADAMS CONSULTING, LLC, a California limited
17 liability company; FBA DISTRIBUTORS, LLC, a
Massachusetts limited liability company; FBA
18 STORES, LLC, a Nevada limited liability company;
GLOBAL MARKETING SERVICES L.L.C., a
19 Nevada limited liability company; INFO PROS,
LLC, a Nevada limited liability company; INFO
20 SOLUTIONS, LLC, a Nevada limited liability
company; ONLINE AUCTION LEARNING
21 CENTER, INC., a Massachusetts corporation;
ONLINE AUCTION LEARNING CENTER, INC.,
22 a Nevada corporation; CHRISTOPHER F.
BOWSER; ADAM S. BOWSER; JODY L.
23 MARSHALL; and JEFFREY A. GOMEZ,

Defendants.

CASE NO. 2:18-cv-00442-JCM-PAL

**STIPULATION AND ORDER
EXTENDING THE DURATION OF
THE TEMPORARY
RESTRAINING ORDER AND
SETTING PRELIMINARY
INJUNCTION HEARING AS TO
DEFENDANTS ADAMS
CONSULTING, LLC, GLOBAL
MARKETING SERVICES L.L.C.,
AND JEFFREY A. GOMEZ**

1 This matter comes before the Court upon the stipulation of plaintiff Federal Trade
2 Commission (“FTC”), and defendants Adams Consulting, LLC, Global Marketing Services
3 L.L.C., and Jeffrey A. Gomez (collectively “Gomez Defendants”), for: (i) further extension of
4 the Stipulated Temporary Restraining Order issued on April 18, 2018 [ECF No. 57] (“Gomez
5 Stipulated TRO”) against the Gomez Defendants; and (iii) extending the briefing schedule and
6 re-scheduling the evidentiary hearing on the FTC’s motion for a preliminary injunction as to the
7 Gomez Defendants. The FTC and the Gomez Defendants, each of which is represented by
8 counsel for purposes of this stipulation, **HEREBY STIPULATE TO THE FOLLOWING:**

9 1. The duration of the Gomez Stipulated TRO [ECF No. 57] is extended and shall
10 remain in place by consent of the Gomez Defendants until the Court issues a ruling on the FTC’s
11 request for a preliminary injunction as to the Gomez Defendants, or further order of the Court.
12 Unless otherwise ordered, all provisions of the Gomez Stipulated TRO shall remain in place
13 during the extension, including the asset freeze and appointment of the receiver Robb Evans &
14 Associates LLC. The Gomez Defendants specifically reserve all rights and nothing herein shall
15 be construed as an admission of any kind or impair Gomez Defendants’ right to assert any and
16 all defenses they may have. The reason for the extension of the Gomez Stipulated TRO is to
17 allow the Gomez Defendants and the FTC additional time to conduct compromise negotiations,
18 and, if necessary, additional time to prepare for the preliminary injunction hearing on the FTC’s
19 request for a preliminary injunction as to the Gomez Defendants.

20 2. All the deadlines for motions, memoranda, proposed orders, pleadings, responses
21 or oppositions, and affidavits concerning the FTC’s request for preliminary injunction as to the
22 Gomez Defendants set forth in the Stipulation and Order Extending the Duration of the
23 Temporary Restraining Orders and Setting Preliminary Injunction Hearing as to Defendants

1 Adams Consulting, LLC, Global Marketing Services L.L.C., and Jeffrey A. Gomez entered on
2 April 27, 2018 [ECF No. 63] are vacated and re-set as follows:


3 a. The FTC shall file with the Court, and serve on counsel for the Gomez
4 Defendants, its memorandum of law in support of its motion for preliminary injunction
5 and a proposed preliminary injunction order as to the Gomez Defendants no later than
6 **Friday, May 25, 2018.**

7 b. The Gomez Defendants shall file with the Court, and serve on
8 Commission counsel, any pleadings concerning preliminary injunction, including
9 responses or oppositions, affidavits, motions, expert reports or declarations, or legal
10 memoranda no later than **Friday, June 8, 2018.**

11 c. The FTC may file with the Court, and serve on counsel for the Gomez
12 Defendants, its reply no later than **Friday, June 15, 2018.**

13 3. The evidentiary hearing on Plaintiff Federal Trade Commission's motion for
14 preliminary injunction as to the Gomez Defendants currently scheduled for Tuesday, June 5,
15 2018 is vacated and is rescheduled to **June 21 , 2018, at 10:30 am PST at the United States**
16 **Courthouse, 333 S. Las Vegas Blvd., Las Vegas, NV 89101 in Courtroom 6A.**

17 **IT IS SO ORDERED:**

18
19 
20 HONORABLE JAMES C. MAHAN
21 UNITED STATES DISTRICT JUDGE

22 DATED: May 7, 2018.

1 **IT IS SO STIPULATED:**

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**Attorney for defendants Adams Consulting,
LLC, Global Marketing Services L.L.C, and
Jeffery A. Gomez**

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2018, I caused the foregoing document to be filed with the Clerk of the Court via the Court's CM/ECF electronic filing system. Additionally, I served all of the counsel and parties listed on the attached Service List by the methods indicated therein.



Roberto Anguizola
Attorney for Plaintiff
FEDERAL TRADE COMMISSION

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Seeking admission Pro Hac Vice

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Court Appointed Receiver

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Services L.L.C, and Jeffery A. Gomez**

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