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12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 FEDERAL TRADE COMMISSION,

15 Plaintiff,

16 v.

17 PUBLISHERS BUSINESS SERVICES,
 18 INC., et al.,

19 Defendants.

20 Case No. 2:08-cv-00620-APG-GWF

21 FOURTH STIPULATED REQUEST
 22 FOR EXTENSION OF TIME TO
 23 COMPLY WITH AUGUST 5, 2021
 24 ORDER ON MANDATE;
 25 [PROPOSED] ORDER THEREON

26 Plaintiff Federal Trade Commission (“FTC”) and Defendants Publishers
 27 Business Services, Inc., Ed Dantuma Enterprises, Inc., Dirk Dantuma, Dries
 28 Dantuma, Jeffrey Dantuma, and Brenda Dantuma Schang (“Defendants”) respectfully stipulate and request that the Court extend the deadline for the parties to comply with the Court’s August 5, 2021 Order (docket #344) from March 8, 2022 to June 7, 2022. This is the parties’ fourth requested extension of time.

On June 10, 2021, the Ninth Circuit issued a judgment affirming in part, vacating in part, and remanding the Judgment of this Court in the above-captioned action. On August 5, 2021, this Court entered an Order (docket #344) consistent with the Ninth Circuit’s mandate and ordering the parties, Plaintiff Federal Trade

1 Commission and Defendants Publishers Business Services, Inc., Ed Dantuma
2 Enterprises, Inc., Dirk Dantuma, Dries Dantuma, Jeff Dantuma, and Brenda
3 Dantuma Schang, to confer about a Stipulated Judgment resolving this case. The
4 Order required the parties to file, by August 31, 2021, an appropriate stipulation, or
5 if they cannot agree, joint or separate briefs explaining the areas of disagreement
6 and a proposed briefing schedule on all remaining issues. On August 26, 2021, the
7 Court granted the parties' "First Stipulated Request for Extension of Time to
8 Comply with August 5, 2021 Order on Mandate" (docket #346), allowing the
9 parties to file this Joint Status Report by October 12, 2021. On October 8, 2021,
10 the Court granted the parties' "Second Stipulated Request for Extension of Time to
11 Comply with August 5, 2021 Order on Mandate" (docket #348). On December 14,
12 2021, the Court granted the parties' "Third Stipulated Request for Extension of
13 Time to Comply with August 5, 2021 Order on Mandate" (docket #352).

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15 In accordance with the Court's August 5, 2021 Order, the parties have
16 engaged in good faith, meaningful settlement discussions. The parties have made
17 substantial progress in settlement negotiations, which has resulted in a proposed
18 settlement order that defendants have indicated they will sign. Once signed, FTC
19 counsel will forward the settlement proposal to the FTC's Bureau of Consumer
20 Protection with the recommendation that it be accepted. If approved by the FTC's
21 Bureau of Consumer Protection, the proposed settlement will need to be reviewed
22 and approved by a majority vote of the Federal Trade Commission.

23 Counsel for the parties anticipate that a thirteen-week extension of time will
24 be sufficient to determine whether the parties can settle this matter or will need to
25 file briefs on areas of disagreement. The parties thus respectfully request an
26 extension of time through and including June 7, 2022 for the filing of a status
27 report on the progress of their settlement negotiations.
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Respectfully submitted,

Dated: March 7, 2022

FEDERAL TRADE COMMISSION
/s/ Faye Chen Barnouw
Faye Chen Barnouw
Maricela Segura
Attorneys for Plaintiff
Federal Trade Commission

Dated: March 7, 2022

HOMER BONNER
/s/ Peter W. Homer
Peter W. Homer
Attorney for Defendants
Publishers Business Services, Inc.,
Ed Dantuma Enterprises, Inc.,
Dirk Dantuma, Dries Dantuma, Jeff
Dantuma, and Brenda Dantuma Schang

IT IS SO ORDERED:



HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

DATED: March 8, 2022