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

13 FEDERAL TRADE COMMISSION,

14 Plaintiff,

15 v.

16 IVY CAPITAL, INC., *et al.*,

17 Defendants, and

18 CHERRYTREE HOLDINGS, LLC, *et al.*,

19 Relief Defendants.

Civil Action No. 2:11-cv-00283-JCM-GWF

**STIPULATION FOR EXTENSION OF  
TIME FOR FEDERAL TRADE  
COMMISSION TO RESPOND TO  
MOTION FOR RELIEF UNDER FED. R.  
CIV. P. 60(b) (ECF 449)  
(FIRST REQUEST)**

20 On May 25, 2021, defendants Benjamin Hoskins and Dream Financial and relief  
21 defendants Leanne Hoskins, Oxford Financial LLC, and Mowab, Inc. moved under Fed. R. Civ.  
22 P. 60(b) for relief from the “equitable monetary relief portion of the Court’s Final Judgment and  
23 Order for Permanent Injunction and Monetary Relief.” *See* ECF No. 449. The Court issued that  
24 underlying judgment on July 5, 2013. *See* ECF 409. Under L.R. 7-2(b), the Federal Trade  
25 Commission’s response to the Rule 60(b) motion is due by June 8.

On June 2, counsel for the FTC requested an extension of one week, through June 15, for

1 the FTC to respond to the motion. FTC counsel was not part of the original trial team on this  
2 case, and the extension request was made to allow for additional case file review. Counsel for  
3 the moving parties consented to the FTC's request. This is the first stipulation for an extension  
4 of time to respond to the Rule 60(b) motion.

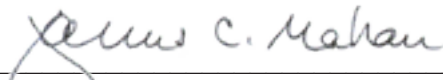
5 WHEREFORE, the FTC and the moving parties stipulate that the FTC shall have until  
6 June 15, 2021, to respond to the Rule 60(b) motion (ECF No. 449).

7  
8 SO STIPULATED, June 4, 2021.

9  
10 /s/ P. Connell McNulty  
11 P. Connell McNulty  
12 Attorney for Federal Trade Commission

13  
14 /s/ David R. Koch  
15 David R. Koch  
16 Daniel G. Scow  
17 Attorneys for Defendants Benjamin Hoskins and Dream Financial  
18 and Relief Defendants Leanne Hoskins, Oxford Financial LLC, and  
19 Mowab, Inc.

20  
21 IT IS SO ORDERED:

22   
23 \_\_\_\_\_  
24 The Honorable James C. Mahan  
25 United States District Court Judge

DATED: June 4, 2021

**Certificate of Service**

I hereby certify that on June 4, 2021, I electronically filed the foregoing document with the Court using CM/ECF, which will send a notice of electronic filing to all counsel of record.

Date: June 4, 2021

/s/ P. Connell McNulty

P. Connell McNulty

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