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 19 *Attorneys for Defendants AMG Capital Management, LLC; Level 5 Motorsports, LLC;  
 LeadFlash Consulting LLC; Black Creek Capital Corporation; Broadmoor Capital Partners;  
 20 Scott A. Tucker; and Nereyda M. Tucker, as Executor of the Estate of Blaine A. Tucker*

21 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

22  
 23 FEDERAL TRADE COMMISSION  
 Plaintiff,  
 24  
 v.  
 25  
 26 AMG SERVICES, INC., et al.  
 Defendants.  
 27

Case No. 2:12-cv-00536-GMN-VCF

**STIPULATION AND JOINT MOTION  
 TO EXPEDITE BRIEFING SCHEDULE  
 REGARDING MONTHLY  
 ALLOWANCE AMOUNT**

1 Defendants Scott A. Tucker, AMG Capital Management, LLC, Level 5 Motorsports,  
2 LLC, Black Creek Capital Corporation, and Broadmoor Capital Partners, (“Tucker Defendants”)  
3 and Relief Defendants Kim Tucker and Park 269 (“Relief Defendants”) and Plaintiff Federal  
4 Trade Commission (“FTC”) jointly move the Court for an order expediting the parties’ briefing  
5 regarding a proposed modification to the Court’s asset freeze and accounting order (ECF No.  
6 960, the “Order”), as modified by ECF No. 1007, continuing a monthly allowance of  
7 \$8000/month for living expenses. The Tucker Defendants and Relief Defendants request a  
8 continuation of the monthly living expense allowance for a time period of September 1, 2016 to  
9 December 31, 2016. The FTC opposes any continued monthly allowance for living expenses.  
10 The parties will file pleadings for the Court’s consideration in deciding the issue. The parties  
11 state the following in support of their joint motion:

12 1. An existing modification (ECF No. 1007) to the Order allows for a monthly  
13 allowance of \$8000 for Tucker family living expenses. The time period of that modification  
14 expires August 31, 2016. Accordingly, the issue requires attention. The parties have conferred  
15 in an attempt to reach agreement on the issue. Those exchanges have not produced an  
16 agreement.

17 2. The parties jointly request that the Court expedite consideration of the pleadings  
18 on this distinct issue, and agree to the following briefing schedule. Defendants shall file a  
19 motion to modify the asset freeze on August 22, 2016. The FTC shall file a responsive pleading  
20 on or before August 26, 2016. No reply pleading shall be filed.

21 3. The parties request the Court’s consideration of the August 31, 2016 expiration of  
22 the present living allowance when considering the issue submitted for the Court’s decision.

23 **IT IS SO ORDERED.**

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25 Dated this 24 day of August, 2016.

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Gloria M. Navarro, Chief Judge  
United States District Judge

1 Dated: August 22, 2016

2 /s/ Nikhil Singhvi

/s/ Jeff D. Morris

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Motorsports LLC, LeadFlash Consulting LLC,  
Broadmoor Capital Partners, LLC, and AMG  
Capital Management, LLC*

13 /s/ Linda McFee

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2016, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record receiving electronic notification.

*/s/ Jeffrey D. Morris*  
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Berkowitz Oliver LLP