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18 **UNITED STATES DISTRICT COURT**
 19 **DISTRICT OF NEVADA**

20 FEDERAL TRADE COMMISSION,

21 Plaintiff,

22 v.

23 AMG Services, Inc. et al.,

24 Defendants, and

25 Park 269 LLC, et al.,

26 Relief Defendants.
 27
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Case No. 2:12-cv-536

**STIPULATION AND JOINT
 MOTION TO EXPEDITE
 BRIEFING REGARDING ASSET
 FREEZE AND ACCOUNTING
 ORDER**

1 Plaintiff Federal Trade Commission (“FTC”), and Scott Tucker, Nereyda Tucker, as Executor of
2 the Estate of Blaine Tucker, Black Creek Capital Corporation, Level 5 Motorsports LLC, LeadFlash
3 Consulting LLC, Broadmoor Capital Partners, LLC, and AMG Capital Management, LLC (the “Tucker
4 Defendants”) jointly move the Court for an order expediting the parties’ briefing regarding the Court’s
5 asset freeze and accounting order (ECF No. 960, the “Order”) and state as follows:

6 1. The FTC on April 26, 2016 filed a motion for order to show cause why Scott Tucker should
7 not be held in contempt (ECF No. 974), and the Tucker Defendants on the same date filed a motion to
8 reconsider and/or modify the order (ECF No. 975.) The FTC requests expedited consideration of its
9 motion to access additional information and documents necessary to identify relevant assets and notify the
10 holders of assets of their duties under the Order. The Tucker Defendants request expedited consideration
11 of their motion to preserve Mr. Tucker’s Sixth Amendment rights and to secure the release of advance
12 deposit funds or permission to release a reasonable flat fee so that criminal defense counsel can defend the
13 complex criminal case pending in the Southern District of New York.

14 2. The parties jointly request that the Court expedite consideration of those motions, and agree
15 to the following briefing schedule. Responding memoranda shall be filed by May 3, 2016, and reply
16 memoranda shall be filed by May 9, 2016.

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Dated: May 3, 2016

/s/ Nikhil Singhvi

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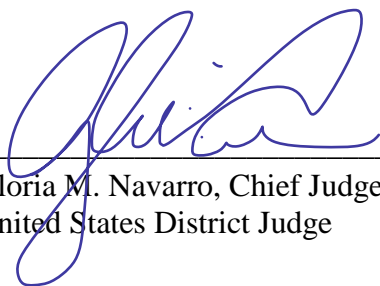
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Attorney for Defendants Scott Tucker, Nereyda Tucker, as Executor of the Estate of Blaine Tucker, Black Creek Capital Corporation, Level 5 Motorsports LLC, LeadFlash Consulting LLC, Broadmoor Capital Partners, LLC, and AMG Capital Management, LLC

IT IS SO ORDERED. Dated

this 3 day of May, 2016



Gloria M. Navarro, Chief Judge
United States District Judge

CERTIFICATE OF SERVICE

I, Nikhil Singhvi, certify that, as indicated below, all parties were served by ECF with **STIPULATION AND JOINT MOTION TO EXPEDITE BRIEFING REGARDING ASSET FREEZE AND ACCOUNTING ORDER** filed with the Court.

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May 3, 2016
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