1		
1	ELSIE B. KAPPLER ALEJANDRO G. ROSENBERG	
2	Federal Trade Commission 600 Pennsylvania Ave., N.W.	
3	CC-9528 Washington, DC 20580	
4	(202) 326-2466 (Kappler) (202) 326-2698 (Rosenberg)	
5	(202) 326-3197 (Fax) Email: ekappler@ftc.gov; arosenberg@ftc.gov	
6 7	Attorneys for Plaintiff Federal Trade Commission	
8	LINUTED STATES DIST	DICT COUDT
o 9	UNITED STATES DIST DISTRICT OF N	
9 10		
10	FEDERAL TRADE COMMISSION,	Case No. 2:14-cv-000683-RFB-VCF
12	Plaintiff,	
13	V.	JOINT STIPULATION BETWEEN THE FTC AND CRYSTAL EWING AND CLASSIC PRODUCTIONS,
14 15	CRYSTAL EWING, individually and as a director or officer of Classic Productions, LLC;	LLC [AND PROPOSED ORDER] MODIFYING THE CASE
15 16		MANAGEMENT ORDER SOLELY AS TO THOSE PARTIES
10	limited liability corporation;	
17	GLOBAL ACCESS MANAGEMENT SYSTEMS, INC., a Nevada company, also d/b/a Citra-Slim 4;	
10 19		
20	RICKI BLACK, individually and as an officer or	
20	director of Global Access Management Systems,	
21	Inc.;	
22	HEALTH NUTRITION PRODUCTS, LLC, a Delaware limited liability company, also d/b/a HNP LLC, d/b/a W8-B-Gone, and d/b/a Quick & Easy;	
23 24		
25	HOWARD RAFF, a/k/a HOWARD BRUCE, individually and as an officer or director of Health	
26		

1	Nutrition Products, LLC;
2 3	DAVID RAFF, individually and as a <i>de facto</i> officer or director of Health Nutrition Products, LLC;
4 5	OMNI PROCESSING CENTER, a Nevada company;
6 7	MBE MANAGEMENT LLC, a Nevada limited liability company;
8 9	SHIRLEY MURPHY, individually and as a director or officer of Omni Processing Center;
10	and
11 12	RONALD BOYDE, individually and as a director or officer of Omni Processing Center and a <i>de</i> <i>facto</i> director or officer of MBE Management
13 14	LLC, Defendants.
15 16	Plaintiff Federal Trade Commission ("FTC") and Defendants Crystal Ewing and Classic
17	Productions, LLC (collectively "The Parties") hereby agree and stipulate as follows:
18	1. The Parties have agreed to a proposed settlement.
19 20	2. All settlements must be approved by the full Federal Trade Commission
20 21	("Commission").
21 22	3. The FTC filed its Motion for Summary Judgment (ECF #73) on July 1, 2015.
22	4. Defendants Ewing and Classic Productions' Opposition is currently due on July
24	23, 2015.
25	
26	
	2

1	5. Should the Commission reject the proposed settlement, the Parties agree that	
2	Defendants Ewing and Classic Productions' Opposition to the FTC's Motion for Summary	
3	Judgment shall be due 21 days after the Parties alert the Court that the Commission has rejected	
4	the proposed settlement. The FTC would then have 14 days from the date of Defendants Ewing	
5	and Classic Production's Opposition to file its Reply.	
6	[PAGE ENDS HERE]	
7		
8		
9		
10		
11		
12		
13		
14		
15		
16 17		
17		
10		
20		
21		
22		
23		
24		
25		
26		

1	6. This Joint Stipulation is made without prejudice to any party's ability to apply to		
2	the Court for any further or additional relief.		
3	Dated: July 13, 2015		
4			
5	Respectfully submitted,		
6			
7	/s/ Elsie B. Kappler		
8	ELSIE B. KAPPLER		
9	ALEJANDRO G. ROSENBERG Federal Trade Commission		
10	600 Pennsylvania Ave., NW		
	Maildrop CC-9528 Washington, D.C. 20580		
11	(202) 326-2466 (Kappler)		
12	(202) 326-2698 (Rosenberg)		
13	(202) 326-3197 (Fax)		
15	Email: ekappler@ftc.gov; arosenberg@ftc.gov Attorneys for Plaintiff		
14	FEDERAL TRADE COMMISSION		
15			
16	/s/ Steven Dilibero		
17	Steven Dilibero		
	130 Dorrance Street Providence, RI 02903		
18	(401) 621-9700		
19	Email: sdilibero@diliberoandassociates.com		
20	Attorney for Defendants Crystal Ewing and Classic Productions, LLC		
21	ORDER		
22	IT IS SO ORDERED.		
23	II IS SO ORDERED.		
24	Ð		
25			
23 26	RICHARD F. BOULWARE, II U.S. District Court Judge		
	DATED: <u>July 21, 2015</u> .		
	4		

1	CERTIFICATE OF SERVICE	
2	I, Elsie B. Kappler, hereby certify that on this 13 th day of July, 2015, I served the	
3	foregoing document electronically on all counsel above via CM/ECF, and on Ricki Black via email to ricki.black@ymail.com.	
4	/s/ Elsie B. Kappler	
5		
6	Elsie B. Kappler	
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25 26		
26		
	5	