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13 *Attorneys for Plaintiff Federal Trade Commission.*

14
 15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
18 Plaintiff,)	
)	
19 v.)	STIPULATION OF ALL PARTIES TO
)	STAY CASE AND TOLL DEADLINES
20 REVMOUNTAIN, LLC, <i>et al.</i> ,)	PENDING COMMISSION’S AND
)	COURT’S REVIEW OF PROPOSED
21 Defendants.)	SETTLEMENTS
)	

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 23 Counsel for Plaintiff Federal Trade Commission (“FTC” or “Commission”) and all
 24 Defendants have agreed on the terms of proposed settlements, subject to review and approval by
 25 the Commission. The FTC and Defendants stipulate herein to the entry of an order staying any
 26 further proceedings in this case and tolling all deadlines to allow the Commission to vote on the
 27 proposed settlements and, should the Commission vote in favor, to allow the Court to consider
 28 them. In support of this request, the FTC and Defendants state as follows:

1 Defendants have signed proposed settlements – *i.e.*, Stipulated Permanent Injunctions
2 and Other Equitable Relief – that FTC counsel plans to recommend to the Commission. The
3 FTC is an independent federal agency. Therefore, FTC counsel does not have authority to file
4 the proposed settlements until the Commission reviews and approves them. The Commission
5 approval process takes some time, usually 60 to 90 days.

6 If the Commission approves the proposed settlements, FTC counsel promptly will file
7 the proposed settlements with the Court. If the proposed settlements have not yet been filed
8 with the Court by May 21, 2018, FTC counsel propose to advise the Court of the status of this
9 case by filing a status report at that time. If any of the settlements are rejected by the
10 Commission or otherwise break down, the FTC plans to file a motion to lift the stay and
11 recalculate the tolled deadlines.

12 Respectfully submitted this 26th day of February, 2018.

13 /s/ SARAH WALDROP
14 SARAH WALDROP
15 MICHELLE SCHAEFER
Attorneys for Federal Trade Commission

16 /s/ GIOVANNI RUSCITTI
17 GIOVANNI RUSCITTI
Attorney for Defendant Blair McNea and all
Corporate Defendants

18 /s/ RACHEL HIRSCH
19 RACHEL HIRSCH
Attorney for Defendant Danielle Foss

20 /s/ RICHARD NEWMAN
21 RICHARD NEWMAN
Attorney for Defendant Jennifer Johnson

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24 **IT IS SO ORDERED:**

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27 UNITED STATES MAGISTRATE JUDGE

28 DATED: 2/27/2018

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PROOF OF SERVICE

I hereby certify that I served the foregoing Stipulation of All Parties to Stay Case and Toll Deadlines Pending Commission's and Court's Review of Proposed Settlements on February 26, 2018, on counsel for all parties as follows via the CM/ECF filing system:

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