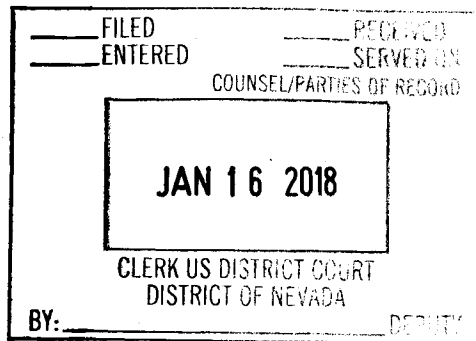


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 15 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

16  
 17 FEDERAL TRADE COMMISSION,  
 18 Plaintiff,  
 19 v.  
 20 CONSUMER DEFENSE, LLC, *et al.*,  
 21 Defendants.

Case No. 2:18-cv-00030-JCM-PAL

**FTC'S MOTION TO LIFT  
 TEMPORARY SEAL FROM  
 ENTIRE FILE AND  
 MEMORANDUM IN SUPPORT  
 THEREOF**

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 23  
 24 Plaintiff, the Federal Trade Commission ("FTC"), respectfully moves this Court to lift the  
 25 temporary seal from the entire file, including the Complaint; FTC's *Ex Parte* Motion for  
 26 Temporary Restraining Order and Other Equitable Relief; Temporary Restraining Order; and all  
 27 pleadings, exhibits, and other papers and materials filed in support thereof, including this motion.

1 Service on most Defendants has been completed and the danger that advance knowledge  
2 by Defendants would pose to the Court's ability to obtain effective final relief, including  
3 restitution for defrauded consumers, has passed.

4 WHEREFORE, for the reasons stated above, the FTC respectfully requests that the Court  
5 grant the accompanying proposed Order to lift the seal from the entire file.

6 Dated January 16, 2018

7 Respectfully submitted,

8 DAVID SHONKA  
9 Acting General Counsel

10 /s/ Gregory A. Ashe

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FEDERAL TRADE COMMISSION

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**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that on January 16, 2018, a copy of **FTC'S MOTION TO LIFT TEMPORARY SEAL FROM ENTIRE FILE AND MEMORANDUM IN SUPPORT THEREOF** was served via overnight courier on the following:

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13 Attorneys for Plaintiff

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

16 FEDERAL TRADE COMMISSION,

17 Plaintiff,

18 v.

19 CONSUMER DEFENSE, LLC, *et al.*,

20 Defendants.  
21  
22

Case No. 2:18-cv-00030-JCM-PAL

**ORDER LIFTING  
TEMPORARY SEAL FROM  
ENTIRE FILE**

23 Upon notice provided by plaintiff Federal Trade Commission that service upon most  
24 Defendants has been perfected and the danger that advance knowledge by Defendants would  
25 pose to the Court's ability to obtain effective final relief, including restitution for defrauded  
26 consumers, has passed:  
27

