

1 **D. BRIAN BOGGESS, No. 4537**
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5
 6 **IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

7 FEDERAL TRADE COMMISSION,

8 Plaintiff,

9 v.

10 CONSUMER DEFENSE, LLC, a Nevada limited
 liability company; CONSUMER LINK, INC., a
 11 Nevada corporation; PREFERRED LAW, PLLC, a
 Utah professional limited liability company;
 12 AMERICAN HOME LOAN COUNSELORS, a
 Utah corporation; AMERICAN HOME LOANS,
 13 LLC, a Utah limited liability company;
 CONSUMER DEFENSE GROUP, LLC, f/k/a
 14 MODIFICATION REVIEW BOARD, LLC, a
 Utah limited liability company; CONSUMER
 15 HOME DEFENSE, LLC, a Utah limited liability
 company; BROWN LEGAL, INC., a Utah
 16 corporation; AM PROPERTY MANAGEMENT,
 LLC, a Utah limited liability company; FMG
 17 PARTNERS, LLC, a Utah limited liability
 company; ZINLY, LLC, a Utah limited liability
 18 company; JONATHAN P. HANLEY, in his
 individual and corporate capacity; BENJAMIN R.
 19 HORTON, in his individual and corporate
 capacity; and SANDRA X. HANLEY, in her
 20 individual and corporate capacity,

21 Defendants.

**STIPULATION TO CONTINUE
 HEARING**

Case No: 2:18-cv-00030-JCM-BNW

22
 23 COME NOW, the Defendants, CONSUMER DEFENSE, LLC; CONSUMER LINK, INC.;
 24 AMERICAN HOME LOAN COUNSELORS; AMERICAN HOME LOANS, LLC; CONSUMER
 25 DEFENSE GROUP, LLC F/K/A MODIFICATION REVIEW BOARD, LLC; BROWN LEGAL, INC.;
 26 FMG PARTNERS, LLC; ZINLEY, LLC; JONATHAN P. HANLEY; AND SANDRA X. HANLEY,
 27 by and through their attorney of record, and the Plaintiff, FEDERAL TRADE COMMISSION, by and
 28 through its attorneys of record, and hereby stipulate, agree and seek this Court's Order as follows:

1. On January 8, 2018, the FTC filed a complaint for permanent injunction and other equitable relief

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1 against individuals Jonathan Hanley, Benjamin Horton¹, and Sandra Hanley, and against the entities
2 Consumer Defense, LLC (Nevada), Consumer Link, Inc. (the “Nevada Corporate Defendants”),
3 Preferred Law, PLLC, American Home Loan Counselors, Consumer Defense Group, LLC, Consumer
4 Defense, LLC (Utah), Brown Legal, Inc., AM Property Management, LLC, FMG Partners, LLC, and
5 Zinly, LLC (the “Utah Corporation Defendants”) (all collectively the “Corporate Defendants”) . (ECF
6 No. 1.)

7 2. On June 5, 2019, D. Brian Boggess entered his Notice of Appearance as Counsel for all of the
8 Defendants, including the Corporate Defendants. (ECF No. 233.)

9 3. At the time Counsel entered his appearance, various discovery-related Motions were pending
10 before the Court, including Defendants’ Emergency Motion to Extend Time Discovery. (ECF 216.)

11 4. That Motion, as well as other pending Motions, has now been set for Hearing before the Court ON
12 July 8, 2019 at 10:00 a.m. (ECF 244.)

13 5. Counsel for Defendants has a conflict during the week of July 8, 2019, wherein he will be outside
14 the reach of cellular phones and the internet while participating in a previously-scheduled fifty-mile
15 backpacking trip with a group of scouts.

16 6. Given Counsel’s conflict, and the importance of the upcoming hearing on the outstanding
17 discovery motions, the parties agree, stipulate and request that this Court continue the Hearing to a date
18 and time convenient to the Court either before July 8, 2019 or on or after July 15, 2019.

19 7. The only dates in July which Counsel for the parties **can not** appear are: July 8-12, July 23 and July
20 24, 2019. The undersigned Counsel will make themselves available any other July date.

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27 ¹On June 5, 2018, the Court entered a stipulated order for permanent injunction and
28 monetary judgment as to Defendant Horton, who is no longer actively involved in this
matter. (ECF No. 111.)

1 8. This stipulation is made in good faith among and at the request of the parties, and not for purposes
2 of delay.

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ALDEN F. ABBOTT, General Counsel

4 By: /s/ D. Brian Boggess
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11 Dated this 27th day of June, 2019.

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Attorneys for Plaintiff

Dated this 27th day of June, 2019.

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ORDER

17 **IT IS ORDERED** that the hearing on the Emergency Motion to Extend Discovery (ECF No. 216)
18 currently set for 7/8/2019 is **VACATED** and **CONTINUED** to 7/19/2019 at 11:00 a.m. in
19 Courtroom 3B.

20 
Honorable Brenda Weksler
United States Magistrate Judge

21 Dated: July 2, 2019