

1 Jonathan Hanley
2 3241 East Granite Point Circle
3 Sandy Utah 84092
4 801-913-5504 |
Jonathanhanley22@gmail.com

5 **UNITED STATES DISTRICT COURT**
6 **FOR THE DISTRICT OF NEVADA**

7
8 FEDERAL TRADE COMMISSION,

9 Plaintiff,

10 v.

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

12 Defendants.

CASE NO. 2:18-CV-00030-JCM-BNW

**STIPULATION TO EXTEND DEADLINE
FOR DISPOSITIVE MOTIONS**

13
14 COME NOW, Jonathan Hanley in his capacity as a pro se Defendant and Defendants,
15 CONSUMER DEFENSE, LLC; CONSUMER LINK, INC. AMERICAN HOME LOAN
16 COUNSELORS; AMERICAN HOME LOANS, LLC; CONSUMER DEFENSE GROUP, LLC
17 F/K/A MODIFICATION REVIEW BOARD, LLC; BROWN LEGAL, INC.; FMG PARTNERS,
18 LLC; ZINLEY, LLC; SANDRA X. HANLEY, by and through their attorney of record, and the
19 Plaintiff, FEDERAL TRADE COMMISSION, by and through its attorneys of record, and hereby
20 stipulate, agree and seek this Court's Order as follows:
21

22 1. On January 8, 2018, the FTC filed a complaint for permanent injunction and other
23 equitable relief against individuals Jonathan Hanley, Benjamin Horton, and Sandra Hanley, and
24 against the entities Consumer Defense, LLC (Nevada), Consumer Link, Inc. (the "Nevada
25 Corporate Defendants"), Preferred Law, PLLC, American Home Loan Counselors, Consumer
26 Defense Group, LLC, Consumer Defense, LLC (Utah), Brown Legal, Inc., AM Property
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STIPULATION TO EXTEND DEADLINE FOR DISPOSITIVE MOTIONS - 1

1 Management, LLC, FMG Partners, LLC, and Zinly, LLC (the “Utah Corporation Defendants”)
2 (all collectively the “Corporate Defendants”) . (ECF No. 1.)

3 2. The current Scheduling Order in this case calls for the filing of all dispositive motions on
4 or before July 15, 2019. (ECF 171.)

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

7 4. The deposition of the FTC’s expert witness, William Violette, was held on September 5th
8 2019.

9 5. Due to the complex nature of this case the substantial involvement of Jonathan Hanley
10 has been necessary. As a result of financial difficulty, The Hanley family has been forced to
11 move 2 times in the last 60 days and is still in the process of their 2nd move thereby allowing
12 Jonathan Hanley little time to be involved in the response to plaintiff’s Motion for Summary
13 Judgement.

14 6. As a result of extreme financial difficulty of the Hanleys, the corporate defendants will
15 join in the response that is filed by Jonathan Hanley.

16 7. The school that the Hanley’s children go to had parent teacher conferences this week
17 which caused a half day on Thursday September 26th 2019 and their children do not have school
18 Friday September 27th 2019.

19 8. It is also their son’s birthday today. Previous plans had been made causing some familial
20 commitments.

21 9. The parties conferred on September 27th 2019 and reached an agreement that an
22 additional 1 day shall apply to the oppositions of all defendants. Accordingly, the response will
23 need to be filed on or before September 30th 2019.

1 10. The parties believe it reasonable to allow Jonathan Hanley an additional 1 day to respond
2 to the plaintiff's motion for Summary Judgment and allow the remaining defendants to join in
3 that response.

4
5 11. Replies, if any, would be due pursuant to the applicable Federal Rules of Civil Procedure
6 and the Local Rules of this Court.

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

9 13. The parties deem it reasonable that this need be the last extension of time for the purposes
10 of responding to the Plaintiff's motion for summary judgement.
11

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13 BOGCESS LAW GROUP

ALDEN F. ABBOTT
General Counsel

14
15 /s/D. Brian Boggess
D Brian Boggess
Nevada Bar No. 4537
16 7495 West Azure Drive, Suite 211
Telephone: (385)248-5700
17 Fax: (855)675-2674
Email: bboggess@boggesslawgroup.com
18 *Attorney for Defendants*

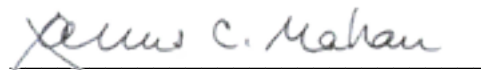
/s/Gregory A. Ashe (with permission)
GREGORY A. ASHE
JASON SCHALL
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580
Telephone: 202-326-3719 (Ashe)
Telephone: 202-326-2251 (Schall)
Facsimile: 202-326-3768
Email: gashe@ftc.gov, jschall@ftc.gov

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21 Dated: September 27th 2019

Respectfully Submitted,

22 /s/ Jonathan Hanley
Jonathan P. Hanley

23
24 **IT IS SO ORDERED:**

25 
26 Honorable James C. Mahan
United States District Judge

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28 **DATED:** September 27, 2019 _____