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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

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

Defendants.

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

**STIPULATION TO EXTEND  
DEFENDANTS REPLY DEADLINE TO  
PLAINTIFFS RESPONSE (ECF NO. 302)**

**STIPULATION**

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

STIPULATION TO EXTEND DEFENDANTS REPLY DEADLINE TO PLAINTIFFS RESPONSE (ECF NO. 302) - 1

1 1. Defendant Jonathan Hanley filed a Request for Relief pursuant to Fed. R. Civ. P. 56(d)  
2 along with an accompanying response on October 4<sup>th</sup> 2019 (ECF No. 295) in response to  
3 Plaintiff FTC's Motion for Summary Judgment filed on July 16<sup>th</sup> 2019. (ECF No. 255)

4  
5 2. Plaintiff FTC filed a response to Hanley's Request for 56(d) Relief on October 18<sup>th</sup> 2019.

6 3. Hanley has asked Plaintiff FTC if they are amenable to agreeing to an October 28<sup>th</sup> reply  
7 deadline with respect to Plaintiff's response concerning Hanley's Fed. R. Civ. P. 56(d) request.

8 4. The juncture that this litigation is at is extraordinarily time consuming for a *pro se*  
9 defendant who also must also manage attempting to support a family. Hanley has represented  
10 to Plaintiff FTC that he has been diligently working on matters concerning this litigation and  
11 does not request this extension for any purposes of delay.  
12

13 5. The parties agree that Hanley may file his reply to Plaintiff FTC's response (ECF No.  
14 302) on Monday October 28<sup>th</sup> 2019.

15 6. This stipulation is made in good faith among and at the request of the parties, and not for  
16 purposes of delay.  
17

18  
19 BOGCESS LAW GROUP

ALDEN F. ABBOTT  
General Counsel

20 /s/D. Brian Boggess (with permission)  
21 D Brian Boggess  
Nevada Bar No. 4537  
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24 *Attorney for Defendants*

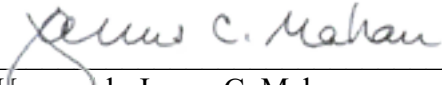
/s/Gregory A. Ashe (with permission)  
25 GREGORY A. ASHE  
26 JASON SCHALL  
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1 Dated: October 25<sup>th</sup> 2019

Respectfully Submitted,

2  
3 /s/ Jonathan Hanley  
Jonathan P. Hanley

4  
5 **IT IS SO ORDERED:**

6   
7 Honorable James C. Mahan  
United States District Judge

8  
9 **DATED:** October 28, 2019