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Washington, DC 20580

10 Attorneys for Plaintiff
11 FEDERAL TRADE COMMISSION

12 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

13 FEDERAL TRADE COMMISSION,

14 Plaintiff,

15 v.

16 AWS, LLC, a Nevada limited liability company;
ADAMS CONSULTING, LLC, a California limited
17 liability company; FBA DISTRIBUTORS, LLC, a
Massachusetts limited liability company; FBA
STORES, LLC, a Nevada limited liability company;
18 GLOBAL MARKETING SERVICES L.L.C., a
Nevada limited liability company; INFO PROS,
19 LLC, a Nevada limited liability company; INFO
SOLUTIONS, LLC, a Nevada limited liability
20 company; ONLINE AUCTION LEARNING
CENTER, INC., a Massachusetts corporation;
21 ONLINE AUCTION LEARNING CENTER, INC.,
a Nevada corporation; CHRISTOPHER F.
22 BOWSER; ADAM S. BOWSER; JODY L.
MARSHALL; and JEFFREY A. GOMEZ,

23 Defendants.

CASE NO. 2:18-cv-00442-JCM-PAL

**STIPULATION AND ORDER
EXTENDING THE DUE DATE
OF THE SETTLEMENT
PAYMENT REQUIRED BY THE
STIPULATED ORDER FOR
PERMANENT INJUNCTION
AND MONETARY JUDGMENT
AS TO DEFENDANTS ADAMS
CONSULTING, LLC, GLOBAL
MARKETING SERVICES L.L.C.,
AND JEFFREY A. GOMEZ**

1 This matter comes before the Court upon the stipulation of the plaintiff Federal Trade
2 Commission (“FTC”) and defendants Adams Consulting, LLC, Global Marketing Services
3 L.L.C., and Jeffrey A. Gomez (collectively “Gomez Defendants”) for extension of the due date
4 of the settlement payment required by the Stipulated Order for Permanent Injunction and
5 Monetary Judgment entered on October 10, 2018 [ECF 107] (“Settlement Order”). The FTC
6 and the Gomez Defendants, each of which is represented by counsel for purposes of this
7 stipulation, **HEREBY STIPULATE TO THE FOLLOWING:**

8 1. On October 10, 2018, the Court entered the Settlement Order as to the Gomez
9 Defendants.

10 2. The Settlement Order requires, among other things, that the Gomez Defendants
11 pay the FTC One Million, Two-Hundred Fifty Thousand Dollars (\$1,250,000) within 180 days
12 of the entry of the Settlement Order, which is April 8, 2019.

13 3. The Settlement Order requires, among other things, that the Gomez Defendants
14 provide the FTC liens on, and security interests in, real and personal property until full payment
15 of the settlement amount.

16 4. On February 15, 2019, through counsel, the Gomez Defendants requested an
17 extension of the due date for the payment required by the Settlement Order.

18 5. Through counsel, the Gomez Defendants informed the FTC that Defendant
19 Jeffrey A. Gomez needs additional time to facilitate the sale of real property in Upland, CA, and
20 that the Gomez Defendants will use the proceeds of that sale to pay in full the \$1,250,000 they
21 owe to the FTC under the Settlement Order.

22 6. The FTC and the Gomez Defendants stipulate and agree to extend the due date of
23 the payment required by the Settlement Order to **July 31, 2019.**

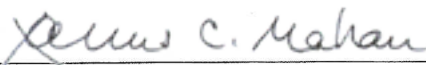
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7. In addition to the security specified in Section III C. of the Settlement Order, the Gomez Defendants, individually and on behalf of their respective successors, assigns, and all other related persons and entities reflected on the title of, or otherwise asserting a lien, mortgage, deed of trust, assignment, pledge, security interest, or other interest in the real property located at 271 Ashbury Lane in Upland, California, hereby grant to the FTC liens on, and security interests in, the real property located at 271 Ashbury Lane in Upland, California, described in Attachment A to this Stipulation, together with all dwelling houses, other structures, improvements, appurtenances, hereditaments, and other rights appertaining or belonging thereto, or which hereafter may be added or attached thereto, and all replacements, substitutions therefor or thereto, and proceeds thereof, whether presently existing or hereafter arising.

8. All other parts of the Settlement Order shall remain unchanged and in full effect, including all liens and security interests required by the Order.

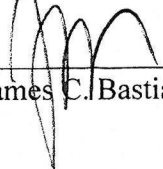
9. The FTC and the Gomez Defendants reserve all rights related to the Settlement Order.


IT IS SO ORDERED:


HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE

DATED: April 4, 2019

IT IS SO STIPULATED:


James C. Bastian, Jr.


Roberto Anguizola

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FEDERAL TRADE COMMISSION

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 4, 2019, I caused the foregoing document to be filed with
3 the Clerk of the Court via the Court’s CM/ECF electronic filing system. Additionally, I served
4 all of the counsel and parties listed on the attached Service List by the methods indicated therein.

5 /s/ Gregory J. Evans
6 Gregory J. Evans
7 Attorney for Plaintiff
8 FEDERAL TRADE COMMISSION
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SERVICE LIST

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11 **Attorneys for Intervenor Bank of**
12 **America, N.A.**

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