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

12  
 13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 v.

18 AWS, LLC, a Nevada limited liability  
 19 company; ADAMS CONSULTING, LLC, a  
 20 California limited liability company; FBA  
 DISTRIBUTORS, LLC, a Massachusetts  
 21 limited liability company FBA STORES,  
 LLC, a Nevada limited liability company;  
 22 GLOBAL MARKETING SERVICES L.L.C.,  
 a Nevada limited liability company; INFO  
 23 PROS, LLC, a Nevada limited liability  
 company; INFO SOLUTIONS, LLC, a  
 24 Nevada limited liability company; ONLINE  
 AUCTION LEARNING CENTER, INC., a  
 25 Massachusetts corporation; ONLINE  
 AUCTION LEARNING CENTER, INC., a  
 26 Nevada corporation; CHRISTOPHER F.  
 BOWSER, individually and as an officer of  
 27 FBA DISTRIBUTORS, LLC, FBA STORES,  
 LLC, INFO SOLUTIONS, LLC, ONLINE  
 28 AUCTION LEARNING CENTER, INC. and  
 ONLINE AUCTION LEARNING CENTER,  
 INC.; ADAM S. BOWSER, individually and

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

**STIPULATION AND ORDER  
 ALLOWING BANK OF AMERICA, N.A.  
 TO INTERVENE AND FILE  
 COMPLAINT-IN-INTERVENTION**

HOLLAND & HART LLP  
 9555 HILLWOOD DRIVE, 2ND FLOOR  
 LAS VEGAS, NV 89134

1 as an officer of AWS, LLC, FBA  
2 DISTRIBUTORS, LLC, FBA STORES,  
3 LLC, INFO SOLUTIONS, LLC, ONLINE  
4 AUCTION LEARNING CENTER, INC. and  
5 ONLINE AUCTION LEARNING CENTER,  
6 INC.; JODY L. MARSHALL, individually  
7 and as an officer of INFO PROS, LLC and  
8 INFO SOLUTIONS, LLC; and JEFFERY A.  
9 GOMEZ, a/k/a JEFF ADAMS or JEFF  
10 ADAM, individually and as an officer of  
11 ADAMS CONSULTING, LLC and  
12 GLOBAL MARKETING SERVICES L.L.C.,

Defendants.

Proposed Intervenor, Bank of America, N.A. (the “Bank”), and Plaintiff, Federal Trade Commission (“FTC”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On September 19, 2018, the Bank filed a Motion to Intervene (ECF No. 91) (the “Motion”) in this action.

2. The Bank shall be granted leave to intervene in this matter as a matter of right under FRCP 24 and to file its proposed Complaint-In-Intervention (the “Complaint”), as set forth in Exhibit 1 to the Motion.

3. The FTC reserves its right to assert all defenses, objections and counterclaims it may have in response to the Bank’s Complaint, including the FTC’s claim against the proceeds and accounts that are the subject of the Complaint.

4. The Bank and the FTC stipulate and agree to waive service of process of the summons and Complaint in accordance with FRCP 4(d). Accordingly, the FTC shall have 60 days from the date the Court approves this Stipulation authorizing the filing of the Complaint to

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answer or otherwise plead, including making a motion under FRCP 12, in response to the Complaint.

IT IS SO STIPULATED:

DATED September 26, 2018

/s/ Robert J. Cassity  
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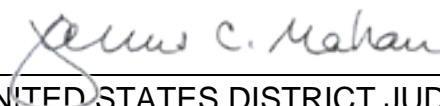
*Attorneys for Intervening Party, Bank of America, N.A.*

DATED September 26, 2018

/s/ Roberto Anguizola  
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*Attorney for Plaintiff  
Federal Trade Commission*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE  
DATED: September 27, 2018