

ROBB EVANS & ASSOCIATES LLC

Receiver of

**World Traders Association, Inc.; United Traders Association, Inc.; International
Merchandise Group, Inc.; Trans-global Connection, Inc.; Musketeer Partners, Inc.;**
Fulfillment Options, Inc. and

Certain Real Property Assets of Sheldon Fidler and Judith T. Fidler

11450 Sheldon Street

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**Federal Trade Commission v. World Traders Association, Inc, et al.
CASE No. CV-05 0591 AHM (CTx)**

**[Proposed] Order on Motion of Sheldon and Judith Fidler and
Jennifer and Jaime Klotthor for a Stay of this Proceeding**

Dated August 2, 2006

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10 *Attorneys for Plaintiff*

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
WESTERN DIVISION

14 FEDERAL TRADE COMMISSION,
15 Plaintiff
16 v.
17 WORLD TRADERS ASSOCIATION,
18 INC., et al.,
19 Defendants.

Case No. CV-05-591 AHM (CTx)

**PROPOSED ORDER ON
DEFENDANTS' MOTION FOR
A STAY OF THIS CASE**

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24 Plaintiff Federal Trade Commission herewith submits, pursuant to
25 instructions of the Court in the hearing on Defendants' Motion for a Stay on July
26 31, 2006, the attached proposed Order on Motion of Sheldon and Judith Fidler and
27 Jennifer and Jaime Klotthor for a Stay of this Proceeding for entry by the Court.

1 Respectfully submitted,

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4 Dated: August 2, 2006

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FEDERAL TRADE COMMISSION



Craig Tregillus
Attorney

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11 *Attorneys for Plaintiff*

12 **UNITED STATES DISTRICT COURT FOR THE**
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14 **FEDERAL TRADE COMMISSION,**

15 **Plaintiff,**

16 **v.**

17 **WORLD TRADERS ASSOCIATION,**
18 **INC., et al.,**

19 **Defendants.**

20 **CASE NO. CV 05-591 AHM (CTx)**
21 **Hon. A. Howard Matz**

22 **ORDER ON MOTION OF**
23 **SHELDON AND JUDITH FIDLER**
24 **AND JENNIFER AND JAIME**
25 **KLOTTHOR FOR A STAY OF**
26 **THIS PROCEEDING**

27 WHEREAS Defendants Sheldon and Judith Fidler were indicted on June 22,
28 2006 in the case, *United States v. Sheldon Fidler and Judith Fidler*, CR 06-508 (CD
CA 2006), and

WHEREAS all four of the remaining individual defendants herein -- Sheldon
and Judith Fidler and Jennifer and Jaime Klotthor -- have moved for a stay of this
proceeding, and

1 WHEREAS the Plaintiff, has responded that the defendants' request for a stay
2 should be granted only with respect to the two Fidler defendants, and

3 WHEREAS the Court, having heard arguments of the parties on July 31, 2006,
4 has found that there is good cause for plaintiff's response to defendants' motion,

5 IT IS THEREFORE ORDERED that this proceeding is stayed with respect to
6 defendants Sheldon and Judith Fidler pending final disposition, including appeals, of
7 the criminal case, *United States v. Sheldon Fidler and Judith Fidler*, CR 06-508 (CD
8 CA 2006).

9 IT IS FURTHER ORDERED that this proceeding is not stayed with respect to
10 defendants Jennifer Klotthor and Jaime Klotthor, subject to the following conditions
11 on any discovery conducted by Plaintiff pursuant to the Scheduling and Case
12 Management Order filed on July 31, 2006:

13 1. Plaintiff may proceed with interrogatories and other discovery requests
14 directed to Jennifer or Jaime Klotthor, but shall defer any future depositions of
15 Jennifer or Jaime Klotthor until the end of the period provided for discovery by the
16 Court's Scheduling and Case Management Order, or their receipt from the United
17 States Attorney of a non-target letter, whichever occurs first;

18 2. Prior to their receipt of a non-target letter from the United States
19 Attorney, Jennifer and Jaime Klotthor shall have the right to assert their Fifth
20 Amendments rights with respect to any specific part of a discovery request that would
21 reasonably create an adverse inference, and Plaintiff shall be barred from relying on
22 any such adverse inference from a response made prior to the defendant's receipt of a
23 non-target letter from the United States Attorney.

24 3. If either Jennifer or Jaime Klotthor is indicted on charges related to the
25 allegations in this case, all pending discovery requests to the person indicted shall be
26 stayed automatically upon issuance of the indictment, without further order of this
27 Court.


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1 IT IS FURTHER ORDERED THAT all of the provisions of the preliminary
2 injunction order entered by this Court on February 22, 2005, shall remain in full force
3 and effect as to all persons, including defendants Sheldon and Judith Fidler.
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5 SO ORDERED this _____ day of _____, 2006.
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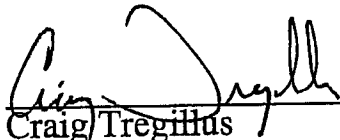
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8 HON. A HOWARD MATZ
9 UNITED STATES DISTRICT JUDGE

10 PRESENTED BY:

11 
12 _____
13 Craig Tregillus
14 Attorney for Plaintiff
Federal Trade Commission
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CERTIFICATE OF SERVICE

I certify that I served copies of the attached *Proposed Order on Defendants' Motion for a Stay* on the persons below by fax, email or overnight courier on August 2, 2006.


Craig Tregillus

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