

1 Roberto Anguizola
Illinois Bar # 6270874
2 (Admitted in the D. Nev. pursuant to LR IA 11-3)
Tel. (202) 326-3284
3 Email: ranguizola@ftc.gov

4 Miry Kim
Washington Bar # 31456
5 (Admitted in the D. Nev. pursuant to LR IA 11-3)
Tel. (202) 326-3622
6 Email: mkim@ftc.gov

7 Gregory J. Evans
DC Bar # 1033184
8 (Admitted in the D. Nev. pursuant to LR IA 11-3)
Tel. (202) 326-3425
9 Email: gevans2@ftc.gov

10 Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail Drop CC-8528
11 Washington, DC 20580

12 Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 v.

18 AWS, LLC, a Nevada limited liability company;
FBA DISTRIBUTORS, LLC, a Massachusetts
19 limited liability company; FBA STORES, LLC, a
Nevada limited liability company; INFO PROS,
20 LLC, a Nevada limited liability company;
ONLINE AUCTION LEARNING CENTER,
21 INC., a Massachusetts corporation; ONLINE
AUCTION LEARNING CENTER, INC., a
22 Nevada corporation; CHRISTOPHER F.
BOWSER; ADAM S. BOWSER; and JODY
MARSHALL,

23 Defendants.

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

**STIPULATION AND ORDER
EXTENDING THE DURATION
OF THE TEMPORARY
RESTRAINING ORDER AND
POSTPONING PRELIMINARY
INJUNCTION HEARING**

1 This matter comes before the Court upon the stipulation of all the parties, including
2 plaintiff Federal Trade Commission (“FTC”), and defendants AWS, LLC, FBA Distributors,
3 LLC, FBA Stores, LLC, Info Pros, LLC, Online Auction Learning Center, Inc. (Mass. Corp.),
4 Online Auction Learning Center, Inc. (Nev. Corp.), Christopher F. Bowser, Adam S. Bowser,
5 and Jody Marshall (collectively “Defendants”), for: (i) extension of the Temporary Restraining
6 Order (“TRO”) issued against Defendants at 1:30 p.m. on March 14, 2018 [ECF No. 29]; and (ii)
7 postponement of the evidentiary hearing on the FTC’s motion for a preliminary injunction. The
8 FTC and Defendants, each of which is represented by counsel for purposes of this stipulation,
9 **HEREBY STIPULATE TO THE FOLLOWING:**

10 1. The duration of the TRO is extended until the Court issues a ruling on the FTC’s
11 request for a preliminary injunction, or further order of the Court. Unless otherwise ordered, all
12 provisions of the TRO shall remain in place during the extension, including the asset freeze and
13 appointment of the receiver Robb Evans & Associates LLC. The requested extension is without
14 prejudice to Defendants. The reason for the extension of the TRO is to allow the Defendants
15 additional time to prepare for the preliminary injunction hearing, and to allow the FTC and the
16 Defendants additional time to conduct compromise negotiations. Defendants specifically reserve
17 all rights and nothing herein shall be construed as an admission of any kind or impair
18 Defendants’ right to assert any and all defenses they may have.

19 2. The preliminary injunction hearing, originally set for March 27, 2018, is vacated
20 and re-set for **April, 18, 2018 at 10:00 a.m.**, at the **United States Courthouse, 333**
21 **S. Las Vegas Blvd., Las Vegas, NV 89101 in Courtroom 6A.**

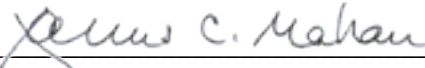
22 3. The deadlines for briefs and affidavits concerning preliminary injunction set forth
23 in Section XXVI of the TRO are vacated and re-set as follows:

1 a. The FTC shall file a proposed preliminary injunction order no later than
2 **March 30, 2018.**

3 b. Defendants shall file with the Court, and serve on FTC counsel, any
4 pleadings concerning preliminary injunction, including responses or oppositions,
5 affidavits, motions, expert reports or declarations, or legal memoranda no later than **April**
6 **6, 2018.**

7 c. The FTC may reply and file responsive or supplemental pleadings,
8 materials, affidavits, or memoranda with the Court and serve the same on Defendants no
9 later than **April 13, 2018.**

10 **IT IS SO ORDERED:**

11
12 
13 HONORABLE JAMES C. MAHAN
14 UNITED STATES DISTRICT JUDGE

15 DATED: March 23, 2018

16 **IT IS SO STIPULATED:**

17 /s/ Ronald Green
18 Ronald D. Green (NV Bar No. 7360)
19 LaTeigra C. Cahill (NV Bar No. 14352)
20 Randazza Legal Group, PLLC
21 4035 S. El Capitan Way
Las Vegas, NV 89147
Tel. (702) 420 2001
Email: ecf@randazza.com

22 **Attorney for defendants AWS, LLC, FBA**
23 **Distributors, LLC, FBA Stores, LLC, Info**
Pros, LLC, Online Auction Learning
Center, Inc. (Mass. Corp.), Online Auction

/s/ Roberto Anguizola
Roberto Anguizola
Illinois Bar # 6270874
(Admitted pursuant to LR IA 11-3)
Tel. (202) 326-3284
Email: ranguizola@ftc.gov

Miry Kim
Washington Bar # 31456
(Admitted pursuant to LR IA 11-3)
Tel. (202) 326-3622
Email: mkim@ftc.gov

1 **Learning Center, Inc. (Nev. Corp.),**
2 **Christopher F. Bowser, Adam S. Bowser,**
3 **and Jody Marshall**

Gregory J. Evans
DC Bar # 1033184
(Admitted pursuant to LR IA 11-3)
Tel. (202) 326-3425
Email: gevas2@ftc.gov

4 Federal Trade Commission
5 600 Pennsylvania Avenue, N.W.
6 Mail Drop CC-8528
7 Washington, D.C. 20580

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23