

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

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

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

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

10 Attorneys for Plaintiff
11 FEDERAL TRADE COMMISSION

**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
18 STORES, LLC, a Nevada limited liability company;
GLOBAL MARKETING SERVICES L.L.C., a
19 Nevada limited liability company; INFO PROS,
LLC, a Nevada limited liability company; INFO
20 SOLUTIONS, LLC, a Nevada limited liability
company; ONLINE AUCTION LEARNING
21 CENTER, INC., a Massachusetts corporation;
ONLINE AUCTION LEARNING CENTER, INC.,
22 a Nevada corporation; CHRISTOPHER F.
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 DURATION OF
THE TEMPORARY
RESTRAINING ORDER AND
VACATING PRELIMINARY
INJUNCTION HEARING
PENDING COMMISSION REVIEW
OF PROPOSED STIPULATED
FINAL ORDER FOR PERMANENT
INJUNCTION AND MONETARY
RELIEF 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 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: (i) further extension of
4 the Stipulated Temporary Restraining Order issued on April 18, 2018 [ECF No. 57] (“Gomez
5 Stipulated TRO”) against the Gomez Defendants; and (ii) vacating the evidentiary hearing on the
6 FTC’s motion for a preliminary injunction as to the Gomez Defendants. The FTC and the
7 Gomez Defendants, each of which is represented by counsel for purposes of this stipulation,
8 **HEREBY STIPULATE TO THE FOLLOWING:**

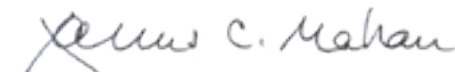
9 1. The duration of the Gomez Stipulated TRO [ECF No. 57] is extended and shall
10 remain in place by consent of the Gomez Defendants until the Court issues a ruling on the FTC’s
11 request for a preliminary injunction as to the Gomez Defendants, or further order of the Court.
12 Unless otherwise ordered, all provisions of the Gomez Stipulated TRO shall remain in place
13 during the extension, including the asset freeze and appointment of the receiver Robb Evans &
14 Associates LLC. The Gomez Defendants specifically reserve all rights and nothing herein shall
15 be construed as an admission of any kind or impair Gomez Defendants’ right to assert any and
16 all defenses they may have. The reason for the extension of the Gomez Stipulated TRO is to
17 allow the FTC to review and, if appropriate, approve a stipulated final order for permanent
18 injunction and monetary relief as to the Gomez Defendants (“Gomez Stipulated Final Order”).
19 FTC counsel are submitting the Gomez Stipulated Final Order to the FTC for review and
20 approval, and are informed that the approval process could take up to eight weeks. If the FTC
21 approves the Gomez Stipulated Final Order, it will be filed for approval by the Court. If
22 approved by the FTC and the Court, the Gomez Stipulated Final Order will resolve all disputes
23 between the FTC and the Gomez Defendants and obviate the need for a preliminary injunction

1 hearing.

2 2. All the deadlines for motions, memoranda, proposed orders, pleadings, responses
3 or oppositions, and affidavits concerning the FTC's request for preliminary injunction as to the
4 Gomez Defendants set forth in the Stipulation and Order Extending the Duration of the
5 Temporary Restraining Order and Setting Preliminary Injunction Hearing as to Defendants
6 Adams Consulting, LLC, Global Marketing Services L.L.C., and Jeffrey A. Gomez entered on
7 May 23, 2018 [ECF No. 72] are vacated until further order of the Court.

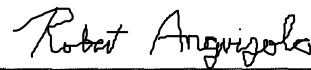
8 3. The evidentiary hearing on Plaintiff Federal Trade Commission's motion for
9 preliminary injunction as to the Gomez Defendants currently scheduled for July 10, 2018 is
10 vacated.

11 **IT IS SO ORDERED:**


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

15 DATED: June 14, 2018
16

17 **IT IS SO STIPULATED:**

18 
19 Roberto Anguizola
20 Illinois Bar # 6270874
(Admitted pursuant to LR IA 11-3)
21 Tel. (202) 326-3284
Email: ranguizola@ftc.gov

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


James C. Bastian, Jr.
Shulman Hodges & Bastian LLP
100 Spectrum Center Drive, Suite 600
Irvine, CA 92618
Tel. (949) 340-3400
Email: jbastian@shbllp.com

**Attorney for defendants Adams Consulting,
LLC, Global Marketing Services L.L.C, and
Jeffery A. Gomez**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

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

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

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION