

Federal Trade Commission, and
State of Ohio ex rel. Attorney General
Dave Yost,

Plaintiffs,

v.

Educare Centre Services, Inc., et al.,

Defendants.

No. 3:19-CV-196

**JOINT REPORT PURSUANT TO THE COURT’S MAY 25, 2020 TEXT ORDER AND
MOTION TO STAY PROCEEDINGS AS TO DEFENDANTS SOUHEIL, 9896988
CANADA, INC., PROLINK VISION, S.R.L., GLOBEX TELECOM, INC., AND 9506276
CANADA, INC. PENDING AGENCY REVIEW OF PROPOSED SETTLEMENT**

Plaintiffs Federal Trade Commission (“FTC”) and State of Ohio (“Plaintiffs”), Defendants Mohammad Souheil, 9896988 Canada, Inc., and Prolink Vision, S.R.L. (collectively, the “Souheil Defendants”), and Defendants Globex Telecom, Inc., and 9506276 Canada, Inc. (collectively, the “Globex Defendants”), by and through undersigned counsel, jointly file this Report pursuant to the Court’s May 25, 2020 Text Order and Motion requesting a stay of all deadlines related to the Souheil Defendants and Globex Defendants (together, the “Stipulating Defendants”) in this matter for 60 days pending agency review of a proposed stipulated final order as to the Stipulating Defendants (“Proposed Final Order”).

As grounds therefore, the stipulating parties state as follows:

1. Counsel for the Souheil Defendants, the shareholders of the Globex Defendants and the Plaintiffs have agreed to resolve all matters in dispute among the Plaintiffs and the Stipulating Defendants by the entry of the Proposed Final Order. The Souheil Defendants, the shareholders of the Globex Defendants and their respective counsel and representatives have all signed the Proposed Final Order.

2. Counsel for the Plaintiffs are in the process of forwarding the Proposed Final Order for review and approval, which includes review by the Director of the FTC's Bureau of Consumer Protection followed by a review and vote by the Commission, and review by management in the Ohio Attorney's General Office.

3. In light of the above, the stipulating parties request that the Court stay all case deadlines as to the Stipulating Defendants for 60 days to facilitate agency review and approval of the Proposed Final Order, and to prevent unnecessary waste of judicial and parties' efforts and resources.

A proposed order is submitted with this Motion.

Respectfully submitted,

ALDEN F. ABBOTT
General Counsel

Dated: June 15, 2020

/s/ J. Ronald Brooke Jr.

Christopher E. Brown
J. Ronald Brooke, Jr.
Federal Trade Commission
600 Pennsylvania Ave., NW
Mailstop CC-8528
Washington, DC 20580
(202) 326-2825 / cbrown3@ftc.gov
(202) 326-3484 / jbrooke@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

DAVE YOST
Ohio Attorney General

/s/ Erin Leahy
Erin Leahy (Ohio Bar #69509)
Assistant Attorneys General
Consumer Protection Section
30 E. Broad Street, 14th Floor
Columbus, Ohio 43215
(614) 466-8831
erin.leahy@OhioAttorneyGeneral.gov
Attorneys for Plaintiff
STATE OF OHIO

/s/ Mitchell N. Roth
Mitchell N. Roth (VBN 35863)
(Admitted)
Genevieve C. Bradley (VBN 83325)
(Admitted Pro Hac Vice)
Gregory M. Caffas (VBN 92142)
(Admitted Pro Hac Vice)
Roth Jackson
8200 Greensboro Drive, Suite 820
McLean, Virginia 22102
Telephone: 703-485-3536
Facsimile: 703-485-3525
mroth@rothjackson.com
gbradley@rothjackson.com
gcaffas@rothjackson.com
Attorneys for Souheil, 9896988 Canada, Inc., and
ProLink Vision, SRL

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[Proposed]

**ORDER GRANTING JOINT MOTION TO STAY PROCEEDINGS AS TO
DEFENDANTS SOUHEIL, 9896988 CANADA, INC., PROLINK VISION, S.R.L.,
GLOBEX TELECOM, INC., AND 9506276 CANADA, INC. FOR 60 DAYS
PENDING AGENCY REVIEW OF PROPOSED SETTLEMENT**

This matter is before the Court on the joint motion of Plaintiffs and Stipulating Defendants Mohammad Souheil, 9896988 Canada, Inc., and Prolink Vision, S.R.L., Globex Telecom, Inc., and 9506276 Canada, Inc. to stay litigation deadlines pending agency review and approval of a proposed settlement between the parties (ECF No. ____).

Accordingly, after due consideration, it is **ORDERED** that the parties' Motion is **GRANTED** and all deadlines as to the Stipulating Defendants are hereby stayed for 60 days from entry of this Order.

It is further **ORDERED** that Plaintiffs shall report to the Court about the status of the review and approval process within 50 days of the entry of this Order

SIGNED this _____ day of _____, 2020.

KATHLEEN CARDONE
UNITED STATES DISTRICT JUDGE