

**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**

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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

  
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Craig Tregillus  
Attorney

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11 *Attorneys for Plaintiff*

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

14  
15 **FEDERAL TRADE COMMISSION,**

16 **Plaintiff,**

17 **v.**

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

20 **Defendants.**

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

ORDER ON MOTION OF  
SHELDON AND JUDITH FIDLER  
AND JENNIFER AND JAIME  
KLOTTHOR FOR A STAY OF  
THIS PROCEEDING

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23 WHEREAS Defendants Sheldon and Judith Fidler were indicted on June 22,  
24 2006 in the case, *United States v. Sheldon Fidler and Judith Fidler*, CR 06-508 (CD  
25 CA 2006), and

26 WHEREAS all four of the remaining individual defendants herein -- Sheldon  
27 and Judith Fidler and Jennifer and Jaime Klotthor -- have moved for a stay of this  
28 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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8 HON. A HOWARD MATZ  
9 UNITED STATES DISTRICT JUDGE

10 PRESENTED BY:

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13 Craig Tregillus  
14 Attorney for Plaintiff  
Federal Trade Commission  
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