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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Federal Trade Commission, Plaintiff, v. LifeLock, Inc. *et al.*, Defendants.	**No. CV-10-00530-PHX-MHM** **PLAINTIFF FEDERAL TRADE COMMISSION'S NOTICE OF LODGING PROPOSED DOCUMENTS UNDER SEAL**

Plaintiff Federal Trade Commission, by and through undersigned counsel, in support of its allegations that from at least October 2012 through March 2014, Lifelock violated the 2010 Order by: 1) failing to establish and maintain a comprehensive information security program to protect its users' sensitive personal

data, including credit card, social security, and bank account numbers; 2) falsely advertising that it protected consumers' sensitive data with the same high-level safeguards as financial institutions; 3) failing to meet the 2010 order's recordkeeping requirements; and 4) from at least January 2012 through December 2014, falsely claiming it protected consumers' identity 24/7/365 by providing alerts "as soon as" it received any indication there was a problem, hereby gives notice to all interested parties that it has lodged under seal with the Court this same date the following:

(1) Memorandum in Support of Its Notice Of Lodging Proposed Documents Under Seal;

(2) Certification of Plaintiff Federal Trade Commission Regarding Conference Requirements under Civil Local Rule 5.6;

(3) Motion for Leave to File Memorandum in Support of Its Motion for Contempt Against LifeLock, Inc. in Excess of the Page Limit;

(4) Motion for Contempt Against LifeLock, Inc.;

(5) Memorandum in Support of Its Motion for Contempt Against LifeLock, Inc.;

(6) FTC Lodged Proposed Exhibits 1 through 73; and

(7) Motion for Leave to Allow the Non-Electronic Filing of Exhibits in Connection with Plaintiff's Motion for Contempt Against LifeLock, Inc. and Memorandum in Support Thereof.

Respectfully submitted,

Dated: July 21, 2015

s/ Gregory J. Madden
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CERTIFICATE OF SERVICE

I certify that I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to the following CM/ECF registrants, and served a copy of same to the following if non-registrants, this 21st day of July, 2015.

Andrew G. Berg, Counsel to LifeLock, Inc. (via CM/ECF)
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Date: July 21, 2015

By: s/ Gregory J. Madden
GREGORY J. MADDEN