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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-JJT** **PLAINTIFF FEDERAL TRADE COMMISSION'S CONSENT MOTION FOR NINETY DAY STAY OF THE PROCEEDINGS**

Plaintiff, Federal Trade Commission ("FTC" or "Commission"), hereby moves this Court to stay the proceedings for ninety (90) days for the following reasons:

1. LifeLock, Inc. ("LifeLock"), with advice of counsel, and counsel for the FTC have negotiated an agreement which would settle the above captioned matter.

2. The Proposed Stipulated Order Resolving FTC's Allegations of Contempt and Modifying Stipulated Final Judgment and Order for Permanent Injunction ("Proposed Stipulated Final Order") has been signed by LifeLock.

3. The FTC is an independent federal agency whose settlements are negotiated by staff and signed by defendants before the Commission votes whether to approve them. While counsel for the FTC is prepared to recommend the settlement to the Commission, the approval process takes some time.

4. The Proposed Stipulated Final Order would result in a complete resolution of all matters currently pending before this Court in this case. Any continued proceedings while the Commission is conducting its review of the Proposed Stipulated Final Order would, therefore, waste this Court's time and resources, as well as those of the parties.

5. On October 27-28, 2015, undersigned counsel communicated with LifeLock's counsel Diana Torres, Esq. and obtained LifeLock's consent to the Court's granting of this Consent Motion staying the proceedings for ninety days while the Commission considers the proposed settlement. No parties will be prejudiced by the granting of this Consent Motion staying the proceedings for ninety days.

Respectfully submitted,

Dated: October 28, 2015

/s Gregory J. Madden
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CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2015, I caused to be served via CM/ECF Plaintiff Federal Trade Commission's Consent Motion for Ninety Day Stay of the Proceedings and [Proposed] Order Granting Plaintiff FTC's Consent Motion for Ninety Day Stay of the Proceedings to all of the following counsel for defendant LifeLock, Inc.:

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