UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

FEDERAL TRADE COMMISSION, and STATE OF FLORIDA, OFFICE OF THE ATTORNEY GENERAL, DEPARTMENT OF LEGAL AFFAIRS, Plaintiffs, v. WORLDWIDE INFO SERVICES, INC., *et al.*, Defendants.	Civil No. 6:14-CV-8-ORL-28DAB

JOINT MOTION FOR ENTRY OF STIPULATED ORDER
FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Plaintiffs, the Federal Trade Commission and the State of Florida, Office of the Attorney General, Department of Legal Affairs (collectively, "Plaintiffs"), and Defendants Worldwide Info Services, Inc., Elite Information Solutions Inc., Absolute Solutions Group Inc., Global Interactive Technologies, Inc., Global Service Providers, Inc., Arcagen, Inc., American Innovative Concepts, Inc., Unique Information Services Inc., National Life Network Inc., Michael Hilgar, Gary Martin, Joseph Settecase, and Yuluisa Nieves (collectively, "Stipulating Defendants"), by and through their undersigned counsel, hereby jointly move this Court for Entry of the attached Stipulated Order for Permanent Injunction and Other Equitable Relief:

1. Plaintiffs filed their Complaint for Permanent Injunction and Other Equitable Relief ("Complaint") on January 6, 2014. (Doc. 1.) Plaintiffs filed their First Amended Complaint for Permanent Injunction and Other Equitable Relief ("First Amended Complaint") on February 25, 2014. (Doc. 53.) The First Amended Complaint added Yuluisa Nieves and National Life Network Inc. as defendants.

2. Plaintiffs and Stipulating Defendants have reached a settlement that will resolve this matter as to these defendants, attached as Exhibit 1 to this motion. Plaintiffs will shortly file its motion for entry of default against the remaining defendant, Live Agent Response 1 LLC.

WHEREFORE, Plaintiffs and Stipulating Defendants jointly respectfully request that the Court enter the attached Stipulated Order for Permanent Injunction and Other Equitable Relief.

Respectfully Submitted,

JONATHAN E. NUECHTERLEIN
General Counsel

s/David A. O'Toole
DAVID A. O'TOOLE, Trial Counsel
MARISSA J. REICH
Federal Trade Commission, Midwest Region
55 West Monroe St., Suite 1825
Chicago, IL 60603
Telephone: (312) 960-5634
Facsimile: (312) 960-5600
dotoole@ftc.gov; mreich@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

FOR STIPULATING DEFENDANTS:

s/Richard Epstein
RICHARD EPSTEIN
FRANKLIN HOMER
Greenspoon Marder, PA
200 East Broward Blvd., Suite 1500
Fort Lauderdale, FL 33301
Telephone: (954) 343-6958
Facsimile: (954) 214-5624
richard.epstein@gmlaw.com;
franklin.homer@gmlaw.com

Attorneys for Defendants Worldwide Info Services, Inc., also d/b/a The Credit

s/Denise Kim
DENISE KIM
Assistant Attorney General
Florida Bar # 69369
Email: Denise.Kim@myfloridalegal.com
Office of the Attorney General
Consumer Protection Division
135 W. Central Blvd., Suite 1000
Orlando, Florida 32801
Telephone: (407) 245-0833
Facsimile: (407) 245-0365

Attorney for Plaintiff
STATE OF FLORIDA
OFFICE OF THE ATTORNEY GENERAL

Dated: October 27, 2014

Voice; Elite Information Solutions Inc., also d/b/a The Credit Voice; Absolute Solutions Group Inc., also d/b/a The Credit Voice; Global Interactive Technologies, Inc., also d/b/a The Credit Voice; Global Service Providers, Inc.; Arcagen, Inc., also d/b/a ARI; American Innovative Concepts, Inc.; Unique Information Services Inc.; National Life Network Inc.; Michael Hilgar; Gary Martin; Joseph Settecase; and Yuluisa Nieves

CERTIFICATE OF SERVICE

I, David A. O'Toole, hereby certify that on October 27, 2014, I electronically filed this **JOINT MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF**, with the Court using the CM/ECF system, which will automatically send copies to all registered counsel, and by electronic and overnight mail to:

Greg Small, Officer of Live Agent Response 1 LLC

Respectfully Submitted,

s/ David A. O'Toole
DAVID A. O'TOOLE
Federal Trade Commission
55 W. Monroe Street, Ste. 1825
Chicago, Illinois 60603
Voice: (312) 960-5634; Fax: (312) 960-5600
dotoole@ftc.gov