UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ROCA LABS, INC., a corporation; ROCA LABS NUTRACEUTICAL USA, INC., a corporation; MUST CURE OBESITY, CO., a corporation; JURAVIN, INCORPORATED, a corporation; ZERO CALORIE LABS, INC., a corporation; DON JURAVIN, individually and as an officer of Roca Labs, Inc., Roca Labs Nutraceutical USA, Inc., Must Cure Obesity, Co, and Juravin, Incorporated; and GEORGE C. WHITING, individually and as an officer of Roca Labs, Inc., Roca Labs Nutraceutical USA, Inc., and Zero Calorie Labs, Inc.

Defendants.

Case No. 8:15-cv-02231-MSS-TBM

JOINT MOTION FOR STAY

In light of significant progress towards settlement of all issues in this case as to all the parties, the parties jointly move that, subject to the continued operation of the preliminary injunction entered in this matter (Dkt. #38), the Court stay all pending deadlines and all discovery in this case until August 1, 2016. The parties additionally move that the Court vacate the current procedural schedule (Dkt. #43).

The parties have reached substantial agreement about how to resolve all of the issues in this case, but need time to take additional steps to facilitate a complete resolution of this matter. Once all aspects of the contemplated settlement are documented, a proposed order will need to be executed by all defendants and approved by a vote of the Federal Trade

Commission before being submitted to the Court. A stay would conserve the resources of the Court, enable the parties to devote their resources to finalizing a settlement rather than litigating, and be in the public interest. The parties would make further report to the Court by August 1, 2016 if they have not, by that time, submitted for the Court's consideration a proposed final order in this matter.

Respectfully submitted,

/s/ *Carl H. Settlemyer, III*
CARL H. SETTLEMYER, III
(Trial Counsel)
PAUL B. SPELMAN
Federal Trade Commission
600 Pennsylvania Avenue, NW
Mail Drop CC-10528
Washington, DC 20580
202-326-2019, -2487 (Tel.)
202-326-3259 (Fax)
csettlemyer@ftc.gov
pspelman@ftc.gov
Attorneys for Plaintiff
Federal Trade Commission

/s/ *Suzette M. Marteny*
SUZETTE M. MARTENY
(Trial Counsel)
Shumaker, Loop & Kendrick, LLP
Bank of America Plaza
101 E. Kennedy Boulevard
Suite 2800
Tampa, FL 33602
813-227-2272 (Tel.)
813-229-1660 (Fax)
smarteny@slk-law.com
Attorneys for Defendants Roca Labs, Inc., Roca Labs Nutraceutical USA, Inc., Must Cure Obesity, Co., Juravin, Incorporated, Zero Calorie Labs, Inc., Don Juravin, and George C. Whiting

CERTIFICATE OF SERVICE

I CERTIFY that on this 18th day of April 2016, I electronically filed the foregoing **Joint Motion for Stay** with the Clerk of the Court by using the CM/ECF filing system, and this document will be served electronically through same to counsel for all parties of record.

s/Carl H. Settlemyer, III
Attorney