UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION Plaintiff, v. EXPAND, INC., a corporation, also d/b/a Gigats, also d/b/a Education Match, also d/b/a SoftRock, Inc., and AYMAN A. DIFRAWI, a/k/a Alec Difrawi, a/k/a Ayman El-Difrawi, individually and as an officer or director of EXPAND, INC. Defendants.	Case No. 6:16-cv-00714-CEM-TBS **JOINT MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT**

JOINT MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT

Plaintiff Federal Trade Commission ("Commission") and Defendants Expand, Inc. and Ayman A. Difrawi hereby move this Court for entry of the attached Stipulated Order for Permanent Injunction and Final Judgment. In support of this motion, the parties state the following:

1. The Commission filed its Complaint for Permanent Injunction and Other Equitable Relief on April 28, 2016, alleging that Defendants violated Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a).

2. The Commission and Defendants have reached a settlement (attached to this motion) that will resolve this matter.

WHEREFORE, the Commission and Defendants jointly request the Court enter the attached Stipulated Order for Permanent Injunction and Monetary Judgment.

Respectfully Submitted,

/s/ Brian S. Shull
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/s/ Thomas Sadaka

(Signed by Filing Attorney with permission of Non-Filing Attorney)

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COUNSEL FOR DEFENDANTS EXPAND, INC. AND AYMAN A. DIFRAWI

DATE: April 28, 2016

CERTIFICATE OF SERVICE

I certify that on this 28th day of April, 2016, I caused to the foregoing Joint Motion for Entry of Stipulated Order for Permanent Injunction and Monetary Judgment to be served on the following individual by Federal Express:

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/s/ Brian S. Shull
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