UNITED STATES DISTRICT COURT
District of Columbia

FEDERAL TRADE COMMISSION,
600 Pennsylvania Ave., N.W.
Washington, DC 20580

Plaintiff,

v.

REVENUEWIRE, also d/b/a SAFECART
Suite 102, 3962 Borden St.
Victoria, BC
V8P 3H8, Canada

and ROBERTA LEACH
4989 Georgia Park Terrace
Victoria, BC
V8Y 2B8, Canada

Defendants.

No. CV- 1:20-cv-01032

JOINT MOTION TO ENTER THE STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT

Plaintiff Federal Trade Commission and Defendants RevenueWire and Roberta Leach, through counsel, hereby jointly move the Court to enter the Stipulated Order filed herewith, and as grounds state as follows:

1. A Complaint has been filed in this action along with a Stipulated Order.
2. The case is an action for injunctive and other equitable relief alleging that Defendants violated the Federal Trade Commission Act, 15 U.S.C. §§ 45(a), 53(b) and 57b, and the Federal Trade Commission's Telemarketing Sales Rule, 16 C.F.R. Part 310.
3. All parties are represented by counsel.

4. The Stipulated Order includes both injunctive relief and a monetary judgment.

WHEREFORE, the Federal Trade Commission and Defendants request that the Court enter the Stipulated Order. The names of the attorneys who are entitled to be notified of entry of the Stipulated Order are Counsel for the FTC, Russell Deitch and J. Ronald Brooke, Counsel for RevenueWire, William L. Greene and J. Nicci Warr, and Counsel for Roberta Leach, Robert M. Langer all of whose addresses are listed below under their signatures.

Respectfully submitted:

Dated: April 21, 2020 *s/* Russell Deitch

Russell Deitch
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s/ 

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CERTIFICATE OF SERVICE

I, Russell Deitch, hereby certify that on April 21, 2020, I transmitted the Joint Motion and Proposed Stipulated Order via electronic mail to the following:

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