IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 17-CV-80619-WPD

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

STRATEGIC STUDENT SOLUTIONS LLC, a limited liability company, STRATEGIC CREDIT SOLUTIONS LLC, a limited liability company, STRATEGIC DEBT SOLUTIONS LLC, a limited liability company, STRATEGIC DOC PREP SOLUTIONS LLC, a limited liability company, STUDENT RELIEF CENTER LLC, a limited liability company, CREDIT RELIEF CENTER LLC, a limited liability company, and,

DAVE GREEN, individually and as an officer of STRATEGIC STUDENT SOLUTIONS LLC, STRATEGIC CREDIT SOLUTIONS LLC, STRATEGIC DEBT SOLUTIONS LLC, STRATEGIC DOC PREP SOLUTIONS LLC, STUDENT RELIEF CENTER LLC, and CREDIT RELIEF CENTER LLC,

Defendants, and

DG INVESTMENT PROPERTIES LLC,

Relief Defendant.
_____/

STIPULATION ON GREENSPOON'S RENEWED MOTION TO WITHDRAW AS COUNSEL AND MOTION FOR PAYMENT FROM RECEIVERSHIP ESTATE

Plaintiff Federal Trade Commission ("FTC"), the Court's Receiver, Charles H. Lichtman (the "Receiver"), and the law firm of Greenspoon Marder, P.A. and Attorneys Richard W. Epstein and Jeffrey A. Backman (collectively, "Greenspoon"), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on August 28, 2017, Greenspoon filed its renewed motion to withdraw as counsel of record for Defendants Strategic Student Solutions, LLC, Strategic Credit Solutions, LLC, Strategic Debt Solutions, LLC, Strategic Doc Prep Solutions, LLC, Student Relief Center, LLC, Credit Relief Center, LLC and Dave Green, and Relief Defendant DG Investment Properties LLC (collectively "Defendants"), and also moved for payment of Greenspoon's fees and costs from the receivership estate from July 21, 2017 until the end of its representation in this matter going forward on an ongoing basis (the "Renewed Motion") (Dkt. No. 79).

WHEREAS, on September 11, 2017, the FTC filed its Opposition to Defendants' Counsel's Renewed Motion to Withdraw as Counsel and Motion for Payment from Receivership Estate (Dkt. No. 81), in which the FTC did not oppose Greenspoon's renewed request to withdraw from representation of the Individual Defendant, but opposed the request to withdraw from representation of the Corporate and Relief Defendants without substitute counsel in place and opposed the request for payment from the Receivership Estate.

WHEREAS, on September 18, 2017, the Receiver filed a Joinder as to the FTC's Objection to Greenspoon Marder's Motion to Withdraw (Dkt. No. 83).

WHEREAS, no other objections or oppositions to the Renewed Motion were filed.

WHEREAS, the Court set a notice of hearing on the Renewed Motion for October 5, 2017 at 1:30 p.m.

WHEREAS, the FTC, the Receiver, and Greenspoon desire to resolve the Renewed Motion, including without need for a hearing before the Court.

IT IS HEREBY STIPULATED THAT:

1. Greenspoon withdraws the branch of its Renewed Motion seeking payment of attorneys' fees from the Receivership Estate.

2. With the request for payment of attorneys' fees from the Receivership Estate withdrawn, both the FTC and the Receiver withdraw their objections and oppositions to the remainder of Greenspoon's Renewed Motion to Withdraw.

Dated: October 4, 2017

GREENSPOON MARDER, P.A.

/s/ Jeffrey A. Backman

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FEDERAL TRADE COMMISSION

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of October, 2017, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using CM/ECF service, which will provide copies to all counsel of record, and served upon Dave Green by e-mail and by certified mail at 8142 Banpo Bridge Way, Delray Beach, FL 33446.

/s/Jeffrey A. Backman
Jeffrey A. Backman