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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. STUDENT ADVOCATES TEAM, LLC, et al., Defendants.	Case No.: 8:19-cv-01728-JWH-JDE **PLAINTIFF FEDERAL TRADE COMMISSION'S REQUEST FOR DECISION ON (1) STIPULATION AS TO ENTRY OF ORDER FOR PERMANENT INJUNCTION, MONETARY RELIEF AND FINAL JUDGMENT AS TO DEFENDANTS STUDENT ADVOCATES TEAM, LLC; PROGRESS ADVOCATES GROUP, LLC; STUDENT ADVOCATES GROUP, LLC; ASSURANCE SOLUTION SERVICES, LLC; AND BRADLEY JASON HUNT [ECF NO. 71], AND (2) STIPULATION AS TO ENTRY OF ORDER FOR PERMANENT INJUNCTION AND FINAL JUDGMENT AS TO DEFENDANT SEAN QUINCY LUCERO [ECF NO. 72]**

Pursuant to Local Rule 83-9.2, Plaintiff Federal Trade Commission respectfully requests that the Court enter a decision on the following stipulations for entry of final judgment resolving this matter in its entirety (the "Stipulations"):

> Stipulation as to Entry of Order for Permanent Injunction, Monetary Relief and Final Judgment as to Defendants Student Advocates Team, LLC; Progress Advocates Group, LLC; Student Advocates Group, LLC; Assurance Solution Services, LLC; and Bradley Jason Hunt [ECF No. 71],
>
> and
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> Stipulation as to Entry of Order for Permanent Injunction and Final Judgment as to Defendant Sean Quincy Lucero [ECF No. 72].

The parties filed the Stipulations on May 17, 2021. Counsel appeared before the Court by videoconference on June 11, 2021, and the matter was taken under submission that day. More than 120 days have passed since the Court took the Stipulations under submission. Local Rule 83-9.2 provides that:

> If the Court does not render and file its decision on a submitted matter within 120 days of submission, all counsel shall, within 130 days after the matter is submitted for decision, file with the Court a joint request that such decision be made without further delay. A copy of such request shall be sent to the Chief Judge.

Plaintiff has reached out to counsel for Defendants multiple times and requested that Defendants join this request pursuant to Local Rule 83-9.2. (Declaration of Delilah Vinzon ¶¶ 5-10, Ex. A.) We understand that Defendants' lead counsel has been traveling. Therefore, Defendants have not joined this request at this time. Nevertheless, Plaintiff requests that the Court enter judgment consistent with the Stipulations agreed to and signed by all remaining parties in the case without further delay. As required, Plaintiff is providing a copy of this request to the Chief Judge.

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Respectfully submitted,

DATED: October 19, 2021

/s/ Delilah Vinzon
Delilah Vinzon
John D. Jacobs
Maricela Segura

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION