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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. 8 Figure Dream Lifestyle LLC, et al., Defendants.	No. SACV 19-1165-DOC (KESx) **JOINT APPLICATION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT AS TO DEFENDANTS 8 FIGURE DREAM LIFESTYLE LLC; JL NET BARGAINS, INC.; KAPPY ENTERPRISES LLC; MILLIONAIRE MIND ENTERPRISES LLC; SPIRIT CONSULTING GROUP, INC.; JOHN A. BAIN; ALEX DEE; BRIAN M. KAPLAN; AND JERROLD S. MAURER**

Plaintiff Federal Trade Commission ("FTC") and remaining Defendants 8 Figure Dream Lifestyle LLC; JL Net Bargains, Inc.; Kappy Enterprises LLC; Millionaire Mind Enterprises LLC; Spirit Consulting Group, Inc.; John A. Bain; Alex Dee; Brian M. Kaplan; and Jerrold S. Maurer ("Stipulating Defendants") respectfully submit this Joint Application for Entry of Stipulated Permanent Injunction and Monetary Judgment.[1]

Stipulating Defendants have agreed to and signed the attached proposed Stipulated Order for Permanent Injunction and Monetary Judgment, which will resolve all remaining issues in this action. Accordingly, the FTC and Stipulating Defendants respectfully request that the Court enter the proposed Stipulated Order.

Additionally, given the submission of the proposed Stipulated Order, the FTC and Stipulating Defendants respectfully request that the Court cancel the pre-trial conference now scheduled for Tuesday, September 14, at 8:30 a.m. *See* Dkt. No. 110.

[1] The Court previously entered a stipulated order for permanent injunction against Defendant OEA, LLC. (Dkt. No. 96).

Respectfully submitted,

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General Counsel

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ATTESTATION OF APPROVAL OF CONTENT AND AUTHORIZATION TO USE ELECTRONIC SIGNATURE

P. Connell McNulty, co-counsel for Plaintiff, attests that, in accordance with Central District Local Rule 5-4.3.4(a)(2)(i), Richard P. Lawson, co-counsel for Stipulating Defendants, concurs in the contents of the foregoing Joint Application for Entry of Stipulated Permanent Injunction and Monetary Judgment and has authorized the filing of the same and the use of his electronic signature thereon.

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2020, I electronically filed the foregoing Joint Application for Entry of Stipulated Permanent Injunction and Monetary Judgment with the Clerk of the Court using CM/ECF, causing a Notice of Electronic Filing to be sent to Richard P. Lawson, Esq., Christine M. Reilly, Esq., and Danielle C. Newman, Esq. counsel to Defendants: (1) 8 Figure Dream Lifestyle LLC, (2) JL Net Bargains, Inc., (3) Kappy Enterprises, LLC, (4) Millionaire Mind Enterprises, LLC, (5) Spirit Consulting Group, Inc., (6) John A. Bain, (7) Alex Dee, (8) Brian M. Kaplan, and (9) Jerrold S. Maurer.

/s/ *P. Connell McNulty*