UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
United States Department of Justice
Consumer Protection Branch
450 5th St. NW, Suite 6400
Washington, DC 20001,
Plaintiff,
v.
NEXWAY SASU, a corporation
1 Avenue du General de Gaulle
92074 Paris, La Defense, France,

NEXWAY GROUP AG, a corporation,
Gerbergässlein 48
4051 Basel, Switzerland,

ASKNET SOLUTIONS AG, a corporation,
(formerly ASKNET AG and NEXWAY AG)
Vincenz-Prießnitz-Straße 3
76131 Karlsruhe, Germany,

NEXWAY, INC., a corporation,
235 West Lake Center, Number 30,
Daly City, CA 94105,

ASKNET, INC., a corporation,
4804 Mission Street, Suite 208
San Francisco, CA 94112,

VICTOR IEZUITOV, also dba VICTOR LEZUITOV, individually and as an officer of NEXWAY SAS, NEXWAY GROUP AG, ASKNET AG, and NEXWAY AG, and

CASEY POTENZONE, individually and as an officer of NEXWAY SAS, NEXWAY GROUP AG, ASKNET AG, and NEXWAY AG,
Defendants

Case No. 1:23-cv-00900-TNM

STIPULATED MOTION TO ENTER THE STIPULATED ORDER FOR PERMANENT INJUNCTION, MONETARY RELIEF AND OTHER RELIEF AS TO NEXWAY SASU, NEXWAY GROUP AG, NEXWAY, INC. AND VICTOR IEZUITOV

The United States of America (Plaintiff) and Defendants Nexway SASU, Nexway Group AG, Nexway, Inc. (collectively "Nexway") and Victor Iezuitov ("Iezuitov") through counsel, hereby jointly move the Court to enter the Stipulated Order filed by Plaintiff, and as grounds state as follows:

1. A Complaint has been filed in this action. Counsel for the defendants was provided a copy of the filed Complaint on April 5, 2023.
2. The case is an action for injunctive and monetary relief alleging that Defendants Nexway and Iezuitov 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, Plaintiff and Defendants Nexway and Iezuitov request that the Court enter the Stipulated Order filed with the Court for Nexway and Defendant Victor Iezuitov.

Respectfully submitted:

Dated: April 12, 2023

/s/ Claude F. Scott
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CERTIFICATE OF SERVICE

I, Claude F. Scott, hereby certify that on April 12, 2023, I transmitted the proposed "Stipulated Order For Permanent Injunction and Monetary Judgement and Other Relief as to Defendants Nexway SASU, Nexway Group AG, Nexway, Inc. and Victor Iezuitov" and "Stipulated Motion to Enter the Stipulated Order for Permanent Injunction, Monetary Relief and Other Relief as to Nexway SASU, Nexway Group AG, and Nexway, Inc. and Victor Iezuitov" via electronic mail to the following:

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