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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. **INTERCONTINENTAL SOLUTIONS LLC**, ***et al.***, Defendants.	Case No. 8:23-CV-01495-SB-JDEx **STIPULATION TO STAY CASE FOR 60 DAYS TO CONSIDER SETTLEMENT AGREEMENT**

Plaintiff, the Federal Trade Commission ("FTC") and Defendants Intercontinental Solutions LLC, Ivan Esquivel, and Robert Kissinger (collectively,

"Settling Defendants"), by and through their undersigned counsel, hereby stipulate, agree, and move the Court for entry of an order ("Order") staying all deadlines in this matter with respect to Settling Defendants for 60 days. In support of this request, the parties state as follows:

1. Counsel for the FTC and Defendants Intercontinental Solutions LLC, Ivan Esquivel, and Robert Kissinger have negotiated a settlement of the claims against Settling Defendants in this matter.
2. Although FTC counsel has authority to negotiate settlement agreements, under Section 4.14 of the FTC's Rules of Practice, 16 C.F.R.§ 4.14(c), only a majority vote by the FTC Commissioners can approve such agreements.
3. If the FTC Commissioners approve the settlement, further litigation in this matter will not be necessary with respect to Settling Defendants. As the FTC's review and approval process can take several weeks, the parties respectfully request that the Court stay the case with respect to Settling Defendants for 60 days to allow time for the FTC Commissioners to review and approve the final settlement.

Based on the foregoing, the parties stipulate and agree that this matter should be stayed as to Settling Defendants pending FTC review and approval of the proposed settlement, and respectfully request that the Court enter the

accompanying proposed order staying all deadlines with respect to Settling Defendants for 60 days.

SO STIPULATED AND AGREED.

/s/ Carlton B. Mosley

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 4, 2023, a true and correct copy of (1) **STIPULATION TO STAY CASE FOR 60 DAYS TO CONSIDER SETTLEMENT AGREEMENT** and (2) **[proposed] ORDER ON STIPULATION TO STAY CASE FOR 60 DAYS TO CONSIDER SETTLEMENT AGREEMENT** were filed electronically with the United States District Court for the Central District of California using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Carlton Mosley
Attorney for Plaintiff Federal Trade Commission