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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. **Ascend Capventures Inc., et al.** Defendants.	Case No. 2:24-cv-07660-SPG-JPR **PLAINTIFF'S AND DEFENDANTS' STIPULATION TO A CONTINUANCE OF THE SEPTEMBER 25, 2024 PRELIMINARY INJUNCTION HEARING**

The Federal Trade Commission ("FTC"), and Defendants, Ascend Capventures Inc., Ascend Ecommerce Inc., Ascend Administration Inc., Ascend Ecom LLC, Ascend Distribution LLC, William Michael Basta, and Jeremy Kenneth Leung (the "Parties"), respectfully file this stipulation requesting that the Court extend the TRO and continue the preliminary injunction hearing in this matter that is currently scheduled for Wednesday, September 25, 2024 at 3:00 pm to Wednesday, October 9, 2024, or such other date as the Court may set.

The FTC filed a Complaint and Application for a Temporary Restraining Order ("TRO") in this matter, under seal, on Monday, September 9, 2024. Dkt. 1, 4, 6, 11-21. This Court granted the TRO on Friday, September 13, 2024, and set a show cause hearing for Wednesday, September 25, 2024 ("PI Hearing") as to whether the Court should enter a preliminary injunction in this matter. Dkt. 30. Counsel for Defendants was not engaged, and did not receive a copy of the Complaint and TRO, until September 20, 2024.

The Parties' requested continuance of the PI hearing to October 9, 2024, or such other date as the Court may set, is necessary to give the Parties time to explore whether they might stipulate to the terms of a preliminary injunction. Through counsel, the FTC and all Defendants have already begun discussions on compliance with the TRO, expedited discovery, and the possibility of entering a stipulated preliminary injunction.[1]

The Parties further stipulate that any deadlines in the TRO fixed to the date of the PI hearing be extended in accordance with the new PI hearing date; but any deadlines in the TRO fixed to the date of the issuance of the TRO will not be extended.

[1] The Parties agree that this Stipulation does not constitute consent to personal jurisdiction, nor a waiver of service of process or any of Defendants' rights or defenses.

Respectfully submitted,

Dated: September 23, 2024

/s/ Jody Goodman

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