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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 PRELIMINARY INJUNCTION**

Plaintiff 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 (collectively, "Defendants") respectfully file this stipulation requesting that the Court enter a stipulated preliminary injunction as to Defendants, filed herewith.

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, including an asset freeze, appointment of a temporary receiver, immediate access to Defendants' business premises, and other temporary relief, on Friday, September 13, 2024. Dkt. 30. The TRO also ordered Defendants to appear on Wednesday September 25, 2024, and show cause why a preliminary injunction should not issue against them. Dkt. 30. The parties twice stipulated to a continuance of the show cause hearing and extension of the TRO and the Court granted those requests, Dkts. 42 and 55, ultimately continuing the hearing date and extending the TRO to Wednesday, October 23, 2024. Dkt. 55.

Prior to the hearing, the FTC and Defendants agreed to the entry of a preliminary injunction for the duration of this litigation, the terms of which are set out in the attached proposed stipulated preliminary injunction.

SO STIPULATED AND AGREED:

For Plaintiff Federal Trade Commission:

/s/ Jody Goodman

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2024, I served the foregoing **PLAINTIFF'S AND DEFENDANTS' STIPULATION TO A PRELIMINARY INJUNCTION** on the following attorneys via CM/ECF:

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