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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, DEFENDANTS' AND RECEIVER'S STIPULATION TO EXTEND THE TEMPORARY RESTRAINING ORDER UNTIL ENTRY OF A PRELIMINARY INJUNCTION**

The Federal Trade Commission ("FTC"); 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"); and Stephen J. Donell, the Court-appointed Receiver, respectfully file this stipulation requesting that the Court extend the TRO until November 6, 2024 (14 days from today) or until entry of a preliminary injunction, whichever is earliest. This extension is necessary to ensure that the Temporary Restraining Order entered by the Court on September 13, 2024, Dkt. 30, and twice extended by

the Court, Dkts. 42 and 55, remains in effect uninterrupted while the Court considers the parties' Stipulation to a Preliminary Injunction, which was filed on Monday, October 21. Dkt. 62. *Without further action by this Court, the TRO will expire today, October 23, 2024.*

In light of the parties' Stipulation to a Preliminary Injunction, this Court, on October 22, 2024, issued a scheduling order and notice vacating the preliminary injunction hearing previously set for today, Wednesday, October 23, 2024. Dkt. 65. On October 22, 2024, the Court also issued a scheduling notice, calling upon the parties to submit a joint memorandum by October 30, 2024, addressing two issues pertaining to the stipulated preliminary injunction. Dkt. 66. The parties intend to work cooperatively to prepare and submit the joint memorandum by the designated date. To ensure that the status quo is maintained in the interim, however, the FTC and the Receiver assert that it is critical that the TRO be immediately extended until the Court has considered the parties briefing on the stipulated PI. In the absence of an immediate extension to the TRO, core provisions of the TRO, including the conduct prohibitions, receivership, and asset freeze, will effectively be dissolved today.

A proposed order extending the TRO is submitted with this stipulation.

SIGNATURE CERTIFICATION

In accordance with Civil Local Rule 5-4.3.4(a)(2)(i), the filer hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: October 23, 2024

Respectfully submitted,

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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