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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FEDERAL TRADE COMMISSION, Plaintiff, v. THEFBAMACHINE INC. et al., Defendants.	CIVIL ACTION NO. 24-6635 (JXN) (LDW) **PLAINTIFF'S UNOPPOSED MOTION FOR ALIGNING BRIEFING SCHEDULE AND HEARING ON APPLICATION FOR PRELIMINARY INJUNCTION WITH OTHER EQUITABLE RELIEF AS TO AMANDA ROZENFELD WITH ORDER EXTENDING TRO AND ADJOURNING PRELIMINARY INJUNCTION HEARING AND MEMORANDUM IN SUPPORT THEREOF**

Plaintiff respectfully requests the Court align the briefing schedule and hearing for Plaintiff's Application for Preliminary Injunction with Other Equitable Relief as to Amanda Rozenfeld with the briefing schedule and hearing set forth in the Order Extending TRO and Adjourning Preliminary Injunction Hearing (Docket No. 22).

MEMORANDUM OF POINTS AND AUTHORITIES

In support of this motion, the FTC states:

1. On June 3, 2024, in connection with its eight-count Complaint, the FTC moved for an *ex parte* temporary restraining order ("TRO") against Bratislav Rozenfeld, aka Steven Rozenfeld and Steven Rozen, and nine corporate defendants who have operated a deceptive

business opportunity scheme. (Docket No. 1, 1-16.) The court granted the TRO on the same day and set the preliminary injunction hearing for June 17, 2024. (Docket No. 5.)

2. On June 14, 2024, the FTC filed its Amended Complaint (Docket No. 27) adding Amanda Rozenfeld as a defendant, and the Court issued an Order Extending the TRO and Adjourning Preliminary Injunction Hearing. (Docket No. 22). The preliminary injunction hearing is currently set for July 30, 2024. Defendants' opposition brief is due July 15, 2024, and the FTC's reply brief is due July 23, 2024.

3. On June 28, 2024, the FTC filed an application for a preliminary injunction against Amanda Rozenfeld for her role in Defendants' deceptive scheme.

4. The FTC requests that the Court align the briefing and hearing schedule set forth in Docket No. 22 with the FTC's current application for a preliminary injunction against Amanda Rozenfeld. Because the FTC alleges that Amanda Rozenfeld is another player in Defendants' scheme, as already described in the FTC's application for a TRO (Docket No. 1-17), the legal standards and the majority of the evidence are the same. Combining the briefing and the hearing schedules will save time and conserve both judicial and party resources.

5. The FTC has communicated its proposed request to counsel for Defendants, who do not oppose the motion.

For the reasons stated above, the FTC respectfully requests, unopposed, that the Court issue the accompanying proposed order aligning the briefing schedule and hearing for its Application for Preliminary Injunction with Other Equitable Relief as to Amanda Rozenfeld with the briefing schedule and hearing set forth in the Order Extending TRO and Adjourning Preliminary Injunction Hearing (Docket No. 22).

Respectfully submitted,

Dated: June 28, 2024

/s/ Colleen Robbins

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