UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, DC 20580

Bureau of Consumer Protection
Division of Marketing Practices

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VIA CM/ECF

The Honorable Julien Xavier Neals
United States District Judge
District of New Jersey
MLK Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Federal Trade Commission v. TheFBAMachine Inc. et al.*,
No. 2:24-cv-6635 (JXN) (LDW) (D.N.J.)

Dear Judge Neals:

Plaintiff Federal Trade Commission ("Plaintiff") files this letter to notify the Court of an error belatedly identified in the Stipulated Preliminary Injunction ("Stipulated PI") it filed last night (Docket No. 51).

Defendants TheFBAMachine Inc.; Passive Scaling Inc.; Sales.Support New Jersey Inc.; 1HR Deliveries Inc.; Hourly Relief Inc.; 3PL Logistic Automation Inc.; FBA Support NJ Corp.; Daily Distro LLC; Closer Green Corp., dba Wraith & Co; and Bratislav Rozenfeld (collectively, "Corporate Defendants and B. Rozenfeld") have stipulated with Plaintiff to a preliminary injunction. Yesterday Plaintiff received the signed document from counsel for Corporate Defendants and B. Rozenfeld and filed it via CM/ECF yesterday evening. Unfortunately, counsel became aware only after filing the Stipulated PI that the definition of "Individual Defendants" in the document is incorrect. Although defendant Amanda Rozenfeld ("A. Rozenfeld") is included in the definition of "Individual Defendants," she has not stipulated to the Stipulated PI, and the inclusion of her name in the definition is in error. (The correct definition should read as follows: "'Individual Defendant' means Bratislav Rozenfeld.")

Plaintiff notified counsel for A. Rozenfeld immediately upon recognizing the error and stated Plaintiff would ensure it was corrected. Plaintiff believes the simplest way to do so is for Plaintiff, Corporate Defendants, and B. Rozenfeld to file a corrected stipulation with the Court.

Plaintiff regrets the error and respectfully requests that the Court refrain from entering the Stipulated PI (Docket No. 51) to allow Plaintiff, Corporate Defendants, and B. Rozenfeld to file a document correcting the error.

Sincerely,

Frances L. Kern
Attorney

cc: Counsel of record (via CM/ECF)