Frances L. Kern
Colleen Robbins
Federal Trade Commission
600 Pennsylvania Ave, NW, CC-8543
Washington, DC 20580
(202) 326-2391; fkern@ftc.gov (Kern)
(202) 326-2548; crobbins@ftc.gov (Robbins)
(202) 326-3395 (Fax)

Attorneys for Plaintiff Federal Trade Commission

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FEDERAL TRADE COMMISSION, Plaintiff, v. THEFBAMACHINE INC. et al., Defendants.	CIVIL ACTION NO. 24-CV-6635 (JXN) (LDW)

PLAINTIFF'S EMERGENCY APPLICATION FOR AN ORDER TO SHOW CAUSE WHY DEFENDANT BRATISLAV ROZENFELD AND ALL CORPORATE DEFENDANTS SHOULD NOT BE HELD IN CONTEMPT OF COURT

Plaintiff, Federal Trade Commission ("FTC"), hereby requests that this Court issue, on an emergency basis, an order to show cause why defendants Bratislav Rozenfeld ("Rozenfeld"), 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, and Closter Green Corp., dba Wraith & Co. (collectively, "Defendants") should not be held in contempt of court.[1] As discussed in greater detail in the accompanying memorandum of law, Defendants have failed to comply with the Temporary Restraining Order and Stipulated Preliminary Injunction issued by this Court.

Defendants have willfully ignored two lawful orders of this Court, flouting the Court's authority and impeding the work of the FTC and the Receiver. As a result, the FTC respectfully requests that this Court enter an emergency order compelling Defendants to show cause why they should not be held in civil contempt. The FTC respectfully suggests that, in the interests of judicial economy, if the Court deems a hearing necessary, the Court could combine it with the hearing for a PI over Amanda Rozenfeld on September 18, 2024.

Respectfully submitted,

Dated: August 29, 2024

/s/ Colleen Robbins

Frances L. Kern (Minnesota Bar No. 0395233)
Colleen Robbins (New Jersey Bar No. 027091997)
Federal Trade Commission
600 Pennsylvania Avenue, NW, CC-8543
Washington, DC 20580
(202) 326-2391; fkern@ftc.gov (Kern)
(202) 326-2548; crobbins@ftc.gov (Robbins)
(202) 326-3395 (fax)

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

[1] This motion does not include individual defendant Amanda Rozenfeld.