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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

FEDERAL TRADE COMMISSION, and
UTAH DIVISION OF CONSUMER
PROTECTION,

Plaintiffs,

v.

ZURIXX, LLC, et al.

Defendants.

**DEFENDANTS JSS INVESTMENT
VENTURES, LLC, JSS TRUST, GERALD
D. SPANGLER, AND STEPHENIE J.
SPANGLER'S POSITION REGARDING
AMG CAPITAL MANAGEMENT, LLC**

Case No.: 2:19-cv-00713-DAK-DAO

Judge Dale Kimball

Magistrate Judge Daphne A. Oberg

Pursuant to the Court's May 6, 2021 Order directing the parties to submit briefing discussing how the ruling in *AMG Capital Management, LLC et al. v. Federal Trade Commission*, 141 S. Ct. 1341 (2021) impacts and applies to their case (ECF No. 241), JSS Investment Ventures, LLC, JSS Trust, Gerald D. Spangler, and Stephenie J. Spangler

(collectively, the “JSS Defendants”), by and through their counsel of record, hereby submit this brief.

The JSS Defendants refer to and adopt the May 28, 2021 Position with Respect to Supreme Court Decision in *AMG Capital Management, LLC* (ECF No. 260) filed by Defendants Zurixx, LLC, Brand Management Holdings, LLC, CAC Investment Ventures, LLC, CAC Investment Ventures, LLC (Puerto Rico) Carlson Development Group, LLC, Carlson Development Group, LLC (Puerto Rico), CJ Seminar Holdings, LLC, Dorado Marketing and Management, LLC, Zurixx Financial, LLC, Zurixx Financial, LLC (Puerto Rico), Christopher A. Cannon, James M. Carlson, and Jeffrey D. Spangler (collectively, the “Zurixx Defendants”). *See* DU-Civ 7-1(a)(4). The JSS Defendants incorporate by reference the arguments and positions set forth in the Zurixx Defendants’ brief, *see id.*, and assert that Plaintiffs should be required to fully prove their case before the Court orders any form of monetary relief or restraint, preliminary or otherwise.

DATED: May 28, 2021.

ARMSTRONG TEASDALE LLP

/s/ Brennan H. Moss
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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2021, a true and correct copy of the foregoing was served via the Court's electronic notification system to all parties registered to receive notice in this action.

/s/ Nicolas Wilde
Nicolas Wilde