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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

<p>FEDERAL TRADE COMMISSION and UTAH DIVISION OF CONSUMER PROTECTION, Plaintiffs, v. ZURIXX, LLC, <i>et al.</i> Defendants.</p>	<p>STIPULATION OF ALL PARTIES TO STAY CASE FOR 60 DAYS TO CONSIDER SETTLEMENT AGREEMENT</p> <p>Case No. 2:19-cv-00713-DAK-DAO</p> <p>District Judge Dale A. Kimball Magistrate Judge Daphne A. Oberg</p>
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Plaintiffs Federal Trade Commission and Utah Division of Consumer Protection and all
Defendants—Zurixx, LLC; Brand Management Holdings, LLC; CAC Investment Ventures, LLC
(Utah); CAC Investment Ventures, LLC (Puerto Rico); Carlson Development Group, LLC

(Utah); Carlson Development Group, LLC (Puerto Rico); CJ Seminar Holdings, LLC; Dorado Marketing and Management, LLC; JSS Investment Ventures, LLC; JSS Trust; Zurixx Financial, LLC (Utah); Zurixx Financial, LLC (Puerto Rico); Cristopher A. Cannon; James M. Carlson; Jeffrey D. Spangler; Gerald D. Spangler (as Trustee for the JSS Trust); and Stephenie J. Spengler (Relief Defendant)—respectfully submit this stipulation for entry of an order staying the case for 60 days, until February 14, 2022, including as to all deadlines that would otherwise apply. In support of this request, the Parties state:

1. Counsel for the Parties have negotiated the terms for a proposed final settlement that would resolve all claims as to all Defendants in this matter.

2. Although FTC counsel has authority to negotiate settlement agreements, under Section 4.14 of the FTC's Rules of Practice, 16 C.F.R. § 4.14(c), only a majority vote by the FTC's Commissioners can approve any such agreements.

3. If a majority of the FTC's Commissioners approve the proposed final settlement, further litigation in this matter will not be necessary.

4. Because the FTC's review and approval process takes several weeks, and there is other pressing end-of-year business pending before the Commission, the Parties respectfully request that the Court stay the case for 60 days, until February 14, 2022, to allow adequate time for the Commission to review and vote on the proposed final settlement in this matter.

5. The Parties will notify this Court when the Commission has voted on the proposed final settlement or will provide a status report by February 14, 2022 if the vote has not been completed by that date.

December 15, 2021

Respectfully submitted,

/s/ Thomas Harris

Roberto Anguizola

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Thomas Harris

(Each appearing per DUCivR 83-1.1(d)(1))

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(Signed by Filing Attorney with
Permission of Plaintiff's Attorney)

/s/ Thomas Harris

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and
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Certificate of Service

I HEREBY CERTIFY that on December 15, 2021, a true and correct copy of the foregoing document was served on counsel for all parties via electronic filing with the Court's ECF service.

/s/Thomas Harris
Thomas Harris

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.

**[PROPOSED] ORDER GRANTING THE
STIPULATION OF ALL PARTIES TO
STAY CASE FOR 60 DAYS TO
CONSIDER SETTLEMENT
AGREEMENT**

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

District Judge Dale A. Kimball
Magistrate Judge Daphne A. Oberg

Before the Court is the stipulation of Plaintiffs Federal Trade Commission and Utah Division of Consumer Protection and all Defendants—Zurixx, LLC; Brand Management Holdings, LLC; CAC Investment Ventures, LLC (Utah); CAC Investment Ventures, LLC (Puerto Rico); Carlson Development Group, LLC (Utah); Carlson Development Group, LLC (Puerto Rico); CJ Seminar Holdings, LLC; Dorado Marketing and Management, LLC; JSS Investment Ventures, LLC; JSS Trust; Zurixx Financial, LLC (Utah); Zurixx Financial, LLC (Puerto Rico); Cristopher A. Cannon; James M. Carlson; Jeffrey D. Spangler; Gerald D. Spangler (as Trustee for the JSS Trust); and Stephenie J. Spengler (Relief Defendant)—to stay the case for 60 days to permit the Commissioners of the Federal Trade Commission to consider and vote on the terms of the proposed final settlement agreement in this matter.

As the Parties stipulate to the terms of this Order and its entry, and for good cause shown, the Court ORDERS as follows:

This case and all applicable deadlines set forth in the Amended Scheduling Order [ECF No. 305] are hereby STAYED for a period of 60 days. Furthermore, the Parties are hereby

ORDERED to notify this Court when the Federal Trade Commission has voted on the proposed final settlement agreement for this matter or to provide a status report by February 14, 2022 if the vote has not been completed by that date.

DATED this __ day of December, 2021.

BY THE COURT:

DALE A. KIMBALL,
United States District Judge