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13 Resident Counsel

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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 FEDERAL TRADE COMMISSION,
18 Plaintiff,
19 v.
20 PUBLISHERS BUSINESS SERVICES, INC.,
21 a corporation; ED DANTUMA
22 ENTERPRISES, INC., a corporation, also dba
23 PUBLISHERS DIRECT SERVICES and
24 PUBLISHERS BUSINESS SERVICES;
25 PERSIS DANTUMA; EDWARD
26 DANTUMA; and BRENDA DANTUMA
27 SCHANG, individually and as officers or
28 managers of Publishers Business Services,
Inc., or Ed Dantuma Enterprises, Inc.,
Defendants.

Case no. 2:08-cv-00620-PMP-PAL
STIPULATION TO AMEND
COMPLAINT PURSUANT TO
FRCP 15(a)(2); PROPOSED ORDER

1 **I. INTRODUCTION**

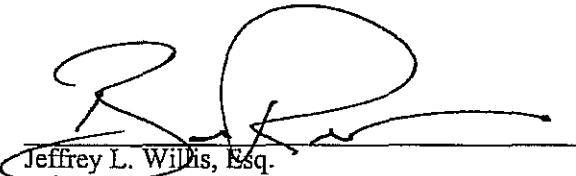
2 On December 17, 2008, Plaintiff Federal Trade Commission ("FTC") filed its "Motion for
3 Leave of Court to File Amended Complaint [FRCP 15(A)]" ("Motion") with an attached proposed
4 Amended Complaint seeking the Court's permission to file the proposed Amended Complaint.
5 The proposed Amended Complaint adds three individual defendants, Dries Dantuma, Dirk
6 Dantuma, and Jeffrey Dantuma, and it modifies certain narrative sections of the original
7 Complaint. On January 5, 2009, Defendants filed their "Opposition to Motion for Leave of Court
8 to File Amended Complaint [FRCP 15(A)]" ("Opposition") to the FTC's Motion. On January 7,
9 2009, the Court set a hearing on Plaintiff's Motion for February 9, 2009, at 3:00 p.m. On January
10 20, 2009, Plaintiff filed its "Reply in Support of FTC's Motion for Leave of Court to File
11 Amended Complaint [FRCP 15(A)]" to Defendants' Opposition.

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13 **II. STIPULATION**

14 Plaintiff FTC and Defendants Publishers Business Services, Inc., Ed Dantuma Enterprises,
15 Inc. doing business as Publishers Direct Services and Publishers Business Services, Persis
16 Dantuma, Edward Dantuma, and Brenda Dantuma hereby agree, pursuant to Fed. R. Civ. P.
17 15(a)(2) to permit Plaintiff FTC to file the Amended Complaint that was attached to Plaintiff's
18 Motion, which was filed on December 17, 2008. These parties further request that the Court
19 remove from the Court's calendar, the February 9, 2009, hearing scheduled on Plaintiff's Motion.

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21 **IT IS SO STIPULATED.**

22 Dated: February 4, 2009

23 
24 Jeffrey L. Willis, Esq.
25 Brian R. Reeve, Esq.
26 Snell & Wilmer LLP
27 Attorneys for Defendants
28 Publishers Business Services, Inc., Ed Dantuma
Enterprises, Inc. dba Publishers Direct Services and
Publishers Business Services, Persis Dantuma,
Edward Dantuma, and Brenda Dantuma Schang

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Dated: February 4, 2009

Raymond E. McKown

Faye Chen Barnouw, Esq.
Raymond E. McKown, Esq.
Maricela Segura, Esq.
Attorneys for Plaintiff
Federal Trade Commission

ORDER

PURSUANT TO THE STIPULATION of the parties, Fed. R. Civ. P. 15(a)(2), and finding Good Cause therefore, this Court HEREBY ORDERS that:

1. Plaintiff FTC is granted permission to file the Amended Complaint that was attached to the FTC's Motion for Leave of Court to File Amended Complaint [FRCP 15(A)] ("Motion"), that was filed on December 17, 2008; and

2. The hearing previously set for February 9, 2009, on Plaintiff's Motion is hereby taken off calendar.

IT IS SO ORDERED.

Dated: February 5, 2009.

Philip M. Pro

The Honorable Philip M. Pro
United States District Judge

Philip M. Pro