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23 **UNITED STATES DISTRICT COURT**
24 **FOR THE DISTRICT OF NEVADA**

25 **FEDERAL TRADE COMMISSION, and**

26 **STATE OF NEVADA,**

27 Plaintiffs,

28 v.

INTERNATIONAL MARKETS LIVE,
INC., et al.,

Defendants.

Case No. 2:25-cv-00760-CDS-NJK

**JOINT NOTICE REGARDING
PROPOSED SETTLEMENT AND
MOTION TO STAY ALL
DEADLINES AS TO
DEFENDANTS ROSA, BROWN,
AND GLOBAL DYNASTY
NETWORK, LLC FOR 60 DAYS
WHILE PROPOSED
SETTLEMENT IS REVIEWED BY
THE FEDERAL TRADE
COMMISSION**

1 Plaintiffs Federal Trade Commission (“FTC” or “Commission”) and State of Nevada and
2 Defendants Global Dynasty Network, LLC (“Global”), Matthew Rosa, and Jason Brown
3 (collectively, the “GDN Defendants”) respectfully submit this joint notice and motion requesting
4 a stay of all deadlines in this matter, relating to Plaintiffs’ claims against the GDN Defendants
5 only, for sixty (60) days. Plaintiffs and the GDN Defendants request this stay so that counsel for
6 the FTC can seek Commission approval of a proposed stipulated final order for permanent
7 injunction and monetary judgment to resolve all Plaintiffs’ claims as to the GDN Defendants. In
8 support of this Motion, the parties hereto state the following:
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10 1. On May 1, 2025, Plaintiffs filed their redacted Complaint for Permanent Injunction,
11 Monetary Judgment, and Other Relief (ECF No. 1) charging the GDN Defendants and seven
12 other defendants with violations of the FTC Act, the Telemarketing Sales Rule, the Restore
13 Online Shoppers’ Confidence Act, and certain Nevada statutes.

14 2. On May 5, 2025, Plaintiffs served Defendants Rosa and Global with the Complaint and
15 Summons. (ECF Nos. 19 and 22).

16 3. On May 8, 2025, Defendant Brown agreed to waive service of the Complaint and
17 Summons. (ECF No. 23).

18 4. On May 28, 2025, Magistrate Judge Koppe endorsed an Order extending the time for
19 Defendants Rosa and Global to respond to the Complaint until July 7, 2025. (ECF No. 40).

20 5. On May 30, 2025, Plaintiffs filed their Motion for a Preliminary Injunction against all
21 Defendants. (ECF No. 42). Defendants’ responses are due by June 13, 2025.

22 6. Plaintiffs’ counsel and counsel for the GDN Defendants have engaged in settlement
23 negotiations, and the GDN Defendants have now signed a proposed stipulated final order that
24 includes provisions for permanent injunctive and monetary relief.
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7. All settlements negotiated by FTC counsel must be approved by vote of the Commission. FTC counsel estimates that the Commission's consideration of the proposed stipulated final order could take up to 60 days.¹ If the proposed stipulated final order is approved by the Commission, Plaintiffs will submit it to the Court for approval.

8. If the Commission approves the proposed stipulated final order, further litigation of this case will be unnecessary as to the GDN Defendants. Accordingly, a stay of all deadlines in this matter relating to Plaintiffs' claims as to the GDN Defendants would serve the interest of judicial economy and conserve the parties' resources.

9. If the Commission does not approve the proposed stipulated final order, the GDN Defendants will have 30 days from the date they are notified by Plaintiffs' counsel of the rejected settlement to respond to the Plaintiffs' Complaint and Motion for a Preliminary Injunction.

WHEREFORE, Plaintiffs and the GDN Defendants respectfully request that the Court grant this Motion and stay all deadlines in this matter relating to Plaintiffs' claims as to the GDN Defendants for 60 days.

Respectfully submitted,

Dated: June 5, 2025

/s/ Laura C. Basford
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¹ Review and approval by the State of Nevada is significantly more streamlined.

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