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

16 **FEDERAL TRADE COMMISSION,**

17 Plaintiff,

18 v.
19

20 **SEQUOIA ONE, LLC, *et al.*,**

21 Defendants.
22

Case No. 2:15-cv-01512-JCM-CWH

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
DEFAULT JUDGMENT AGAINST
DEFENDANTS SEQUOIA ONE,
LLC AND GEN X MARKETING
GROUP, LLC**

23 Pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, Plaintiff Federal Trade
24 Commission ("FTC") respectfully moves this Court for default judgment against Defendants
25 Sequoia One, LLC and Gen X Marketing Group, LLC (collectively, "Corporate Defendants").
26 As set forth in the accompanying Memorandum of Points and Authorities, the FTC seeks
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equitable monetary relief of \$7,135,992 and permanent injunctive relief against the Corporate Defendants and requests that the Court enter the proposed Final Judgment and Order for Injunctive and Other Relief, filed contemporaneously herewith.

Dated: July 26, 2016

Respectfully submitted,

DAVID C. SHONKA
Acting General Counsel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 26, 2016, true and correct copies of (1) **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, LLC**, (2) **PLAINTIFF'S MEMORANDUM IN SUPPORT OF ITS MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, LLC**, (3) **PLAINTIFF'S EXHIBIT IN SUPPORT OF ITS MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS**

1 **SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, and (4) [proposed] FINAL**
2 **JUDGMENT AND ORDER FOR INJUNCTIVE AND OTHER RELIEF AGAINST**
3 **DEFENDANTS SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, LLC** were
4 filed electronically with the United States District Court for the District of Nevada using the
CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF
system.

5 /s/Gregory A. Ashe
6 Attorney for Plaintiff Federal Trade Commission
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