

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

Federal Trade Commission,

Plaintiff,

v.

MOBE Ltd., et al.,

Defendants.

Case No. 6:18-cv-862-ORL-37DCI

**CONSENT MOTION TO EXTEND THE TEMPORARY RESTRAINING
ORDER AND RESCHEDULE THE PRELIMINARY INJUNCTION HEARING**

Plaintiff, the Federal Trade Commission (“FTC”), requests that: (1) the *Ex Parte* Temporary Restraining Order (“TRO”) be extended until July 17, 2018; and (2) the preliminary injunction hearing be rescheduled to 1:30 p.m. on July 17, 2018. All defendants and the Receiver consent to the extension of the TRO and the rescheduling of the preliminary injunction hearing.

The FTC filed suit on June 4, 2018 (Doc. No [1]). On June 5, 2018, the Court entered the TRO (Doc. No [12]), and on June 7, 2018, the Court extended the TRO until June 26, 2018 (Doc. No. [16]). The parties now request that the Court extend the TRO until July 17, 2018, and reschedule the preliminary injunction hearing to take place that day at 1:30 p.m.

Good cause exists to extend the TRO and reschedule the preliminary injunction hearing. Due to the volume of materials filed in this action, defendants have requested additional time to familiarize themselves with the matter and prepare for the preliminary injunction hearing. All parties agree that the TRO should remain in effect until the

preliminary injunction hearing takes place.

All defendants and the Receiver consent to the relief requested in this Motion. Specifically, counsel for defendants Russell Whitney and preliminary counsel for Susan Zanghi consent to the extension of the TRO and rescheduling of the preliminary injunction hearing on behalf of their respective clients. Defendant Matthew Lloyd McPhee and the corporate defendants have not yet retained counsel, but Mr. McPhee is currently in discussions with attorneys to secure representation in this matter. One of those attorneys has represented to the FTC that Mr. McPhee and each of the corporate defendants consents to extension of the TRO and rescheduling of the preliminary injunction hearing to July 17.

Respectfully Submitted,

Dated: June 15, 2018

/s/ Sung W. Kim
Sung W. Kim
Bikram Bandy
Benjamin R. Davidson
Federal Trade Commission
600 Pennsylvania Ave., NW, Mailstop CC-8528
Washington, DC 20580
(202) 326-2211; skim6@ftc.gov
(202) 326-2978; bbandy@ftc.gov
(202) 326-3055; bdavidson@ftc.gov
(202) 326-3395 (fax)

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2018, I electronically filed the foregoing document with the Clerk of Court for the United States District Court for the Middle District of Florida using the Court’s CM/ECF system, and caused a copy of the same to be served on the following via ECF:

David L. Ferguson, Esq. Kopelowitz Ostrow Ferguson Weiselberg Gilbert One West Las Olas Blvd., Suite 500 Fort Lauderdale, FL 3301 Counsel for Russell Whitney	Mark J. Bernet, Receiver 401 E. Jackson Street, Suite 1700 Tampa, Florida 33602 Court Appointed Receiver for the Defendants
---	---

I will send copies of this order electronically to:

Andrew Cove, Esq. Cove Law, P.A. 225 South 21 st Avenue Hollywood, FL 33020	D.J. Poyfair, Esq. Reese Poyfair & Richards PLLC 1050 17th Street Denver, CO 80265
---	---

I will send copies of the order via U.S. Mail to the following defendants via their last known address:

9336-0311 Quebec Inc. 2500-1751 rue Richardson, Montreal, Quebec, H3K1G6, Canada	Matt Lloyd McPhee B1-8-7, 20 JALAN PERAK KUALA LUMPUR
Matt Lloyd Publishing.com Pvt 22 Mercury Street, Carlise, Perth, 6101, Western Australia	MOBE Inc. Azuro Business Center, Suite 580, AVENIDA PEREZ CHITRE, PANAMA 00395
MOBE Ltd. Level 2, Lot 19, Lazenda Commercial Centre, Phase 3, Federal Territories of Labuan, Malaysia 87007	MOBE Online Ltd. 54 Wellington Street, Rose-Hill, Mauritius
MOBE Pro Ltd. Third Floor, 207 Regent Street, London W1B 3HH, United Kingdom	MobeProcessing.com, Inc. Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801
MobeTraining.com, Inc. Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19802	Transaction Management USA, Inc. Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19803