

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NEUROMETRIX, INC., a corporation, and  
Defendants.

SHAI GOZANI, individually and as an officer of  
NEUROMETRIX, INC.,

Defendants.

**Case No. 1:20-cv-10428**

**MOTION FOR APPROVAL OF  
STIPULATED ORDER FOR  
PERMANENT INJUNCTION AND  
MONETARY JUDGMENT**

Plaintiff, Federal Trade Commission (the “Commission” or “FTC”), has filed its Complaint for Permanent Injunction and Other Equitable Relief pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). Defendants NeuroMetrix, Inc. and Shai Gozani have admitted the facts necessary to establish jurisdiction and have agreed to the Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”), attached hereto, in order to resolve the FTC’s complaint allegations against them.

The parties to the attached Order have met and conferred and agree to the filing of this motion. Accordingly, the Commission requests that the Court grant this motion and approve the accompanying Order.

Respectfully submitted,

ALDEN F. ABBOTT  
General Counsel

Dated: March 3, 2020

/s/ Laura M. Sullivan  
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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2020, I served the attached Motion for Approval of Stipulated Order for Permanent Injunction and Monetary Judgment via electronic mail and Federal Express on the following, who is not a registered participant of the CM/ECF System:

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*Attorney for Defendants NeuroMetrix, Inc. and Shai Gozani*