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STIPULATED MOTION TO AMEND THE
COMPLAINT AND FOR ENTRY OF FINAL
JUDGMENT - Page 1

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SMART TOOLS LLC, a Wyoming Limited
Liability Company, KIRSTIN HEGG,
individually and as an officer of Smart Tools
LLC, and CURTIS DAWN, individually and
as an officer of Smart Tools, LLC,

Defendants.

Case No. 3:12-cv-02006-HZ

**STIPULATED MOTION TO AMEND
THE COMPLAINT AND FOR ENTRY
OF FINAL JUDGMENT**

I. CERTIFICATE OF COMPLIANCE WITH LR 7-1

Pursuant to LR 7-1, counsel for Plaintiff United States of America has conferred with defense counsel and they join this motion.

II. MOTION

Plaintiff and Defendants have reached an agreement as to the terms of a settlement and have signed the attached Stipulated Final Judgment and Order for Permanent Injunction and Monetary Relief (“Stipulated Final Order”). As part of the agreed settlement, Defendants stipulate to the addition of Curtis Dawn as an additional Defendant in this case. Defendant Dawn has signed the Stipulated Final Order. The Stipulated Final Order resolves all of the allegations set forth in Plaintiff’s First Amended Complaint. On November 15, 2013, the Federal Trade Commission voted to approve settlement of this case on the terms contained within the Stipulated Final Order.

Counsel for the United States of America and Defendants Kirstin Hegg and Smart Tools LLC hereby move the Court to allow Plaintiff to file an amended complaint, adding Curtis Dawn as an additional Defendant. Counsel for all parties, including Defendant Dawn, also move the

Court to enter final judgment in this matter according to the terms set forth in the attached Stipulated Final Order.

Dated: November 25, 2013

Respectfully submitted by:

s/ Ann F. Entwistle
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