

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 00-CV-3281
	)	Hon. Clifford Scott Green
MERCURY MARKETING OF DELAWARE, INC., )	)	
a corporation, and	)	
	)	
NEAL D. SAFERSTEIN, individually and as an	)	
officer of the corporation.	)	
	)	
Defendants.	)	
	)	
	)	

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**PLAINTIFF’S MOTION FOR AN ORDER TO SHOW CAUSE WHY DEFENDANTS  
SHOULD NOT BE FOUND IN CONTEMPT FOR VIOLATING  
THE STIPULATED JUDGMENT AND ORDER FOR PERMANENT INJUNCTION**

Plaintiff Federal Trade Commission (“FTC” or “Commission”), moves this Court for an Order requiring the above-captioned defendants to appear and show cause why they should not be found in contempt for violating this Court’s Stipulated Judgment and Order For Permanent Injunction (“2001 Order”) entered on March 1, 2001.

The above-captioned defendants and their d/b/a’s are engaged in precisely the same deceptive and misleading practices that led to the FTC’s original action. Defendants practices violate the FTC Act, and of course, the 2001 Order itself, and have resulted in consumer injury.

In support of this Motion, the Commission respectfully refers the Court to the Memorandum in

Support of Plaintiff's Motion for an Order to Show Cause Why Defendants Should Not Be Found in Contempt for Violating the March 1, 2001 Order, and its supporting exhibits.

Dated: \_\_\_\_\_, 2003

Respectfully Submitted,

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