

GREGORY J. MADDEN (MD Bar)
HONG PARK (D.C. Bar No. 475930)
ELISA JILLSON (D.C. Bar No. 989763)
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Mail Drop CC-9528
Washington, D.C. 20580
Tel: (202) 326-2426, -2158, -3001
Fax: (202) 326-3197
email: gmadden@ftc.gov, hpark@ftc.gov,
ejillson@ftc.gov

Attorneys for Plaintiff
Federal Trade Commission

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,

Plaintiff,

v.

LifeLock, Inc., *et al.*,

Defendants.

No. CV-10-00530-PHX-JJT

**PLAINTIFF FEDERAL TRADE
COMMISSION'S CONSENT MOTION
FOR ENTRY OF PROPOSED
STIPULATED ORDER RESOLVING
FTC'S ALLEGATIONS OF CONTEMPT
AND MODIFYING STIPULATED
FINAL JUDGMENT AND ORDER FOR
PERMANENT INJUNCTION**

Plaintiff, Federal Trade Commission (“FTC” or “Commission”), hereby moves this Court to grant its Consent Motion for the Entry of the Proposed Stipulated Order Resolving FTC’s Allegations of Contempt and Modifying Stipulated Final Judgment and Order for Permanent Injunction (“Proposed Stipulated Final Order”).

LifeLock, Inc. (“LifeLock”) and the FTC have negotiated an agreement which would settle the contempt allegations in the above captioned matter. The Proposed Stipulated Final Order was signed by LifeLock and has been approved by the Commission.

On December 17, 2015, undersigned counsel communicated with counsel for LifeLock, Michael J. Gottlieb, and obtained LifeLock’s consent to the Court’s granting of this Consent Motion entering the Proposed Stipulated Final Order.

Respectfully submitted,

Dated: December 17, 2015

/s Gregory J. Madden
GREGORY J. MADDEN
HONG PARK
ELISA JILLSON
Federal Trade Commission
Division of Enforcement
Mailcode: CC-9528
600 Pennsylvania Ave., NW
Washington, DC 20580
(202) 326-2426, gmadden@ftc.gov
(202) 326-2158, hpark@ftc.gov
(202) 326-3001, ejillson@ftc.gov
(202) 326-3197 (facsimile)

Attorneys for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2015, I caused to be served via CM/ECF: (1) PLAINTIFF FEDERAL TRADE COMMISSION'S CONSENT MOTION FOR ENTRY OF PROPOSED STIPULATED ORDER RESOLVING FTC'S ALLEGATIONS OF CONTEMPT AND MODIFYING STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION; and (2) PROPOSED STIPULATED ORDER RESOLVING FTC'S ALLEGATIONS OF CONTEMPT AND MODIFYING STIPULATED FINAL JUDGMENT AND ORDER FOR PERMANENT INJUNCTION to all of the following counsel for defendant LifeLock, Inc.:

David Boies
Boies, Schiller, & Flexner LLP
333 Main Street
Armonk, NY 10504
dboies@bsfllp.com

Michael J. Gottlieb
Boies, Schiller, & Flexner LLP
5301 Wisconsin Ave., NW
Suite 800
Washington, DC 20015
mgottlieb@bsfllp.com

Andrew G. Berg
Greenberg Traurig LLP
2101 L St NW
Ste 1000
Washington, DC 20037
berga@gtlaw.com

Mark A. Nadeau
DLA Piper LLP (US) - Phoenix, AZ
2525 E Camelback Rd., Ste. 1000
Phoenix, AZ 85016-4232
mark.nadeau@dlapiper.com

Cole Jacob Schlabach
DLA Piper LLP (US) - Phoenix, AZ
2525 E Camelback Rd., Ste. 1000
Phoenix, AZ 85016-4232
cole.schlabach@dlapiper.com

Diana M Torres
Kirkland & Ellis LLP - Hope St., Los Angeles, CA
333 S Hope St.
Los Angeles, CA 90071
diana.torres@kirkland.com

Beth M. Weinstein
Kirkland & Ellis LLP - Hope St., Los Angeles, CA
333 S Hope St.
Los Angeles, CA 90071
beth.weinstein@kirkland.com

Mark Holscher
Kirkland & Ellis LLP - Hope St., Los Angeles, CA
333 S Hope St.
Los Angeles, CA 90071
mark.holscher@kirkland.com

Jonathan Faria
Kirkland & Ellis LLP - Hope St., Los Angeles, CA
333 S Hope St.
Los Angeles, CA 90071
jonathan.faria@kirkland.com

Tim Muris
Kirkland & Ellis LLP - Washington, DC
655 15th St. NW, Ste. 1200
Washington, DC 20005
tim.muris@kirkland.com

s/ Gregory Madden
GREGORY MADDEN