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Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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<p>FEDERAL TRADE COMMISSION, Plaintiff, v. RESERVATION COUNTER, LLC, a limited liability company, TRAVELPASS GROUP, LLC, a limited liability company, and PARTNER FUSION, INC., a corporation, Defendants.</p>	<p>Case No. 2:17-cv-01304-RJS  MOTION FOR ENTRY STIPULATED ORDER FOR PERMANENT INJUNCTION AND JUDGMENT</p>
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Plaintiff Federal Trade Commission (“Commission” or “FTC”) moves the Court under DUCivR 7 for entry of the proposed final stipulated order for permanent injunction and judgment

as to all Defendants. In support of this motion, the FTC states as follows:

1. On December 21, 2017, the FTC filed this action against Defendants Reservation Counter, LLC, TravelPASS Group, LLC, and Partner Fusion, Inc. for injunctive and other equitable relief pursuant to Section 13(b) of the Federal Trade Commission Act, 15 U.S.C. § 53(b).

2. The parties have settled this matter and have consented to entry of a Stipulated Order for Permanent Injunction and Judgment. The Stipulation to Enter Final Order and Judgment is attached to this Motion as Attachment A, as is a proposed Order granting this motion and entry of the stipulated order, attached to this Motion as Attachment B.

3. Entry of the proposed Stipulated Order for Permanent Injunction and Judgment would resolve this matter in full, except the Court would retain jurisdiction of the matter for purposes of construction, modification, and enforcement.

Wherefore, the FTC respectfully moves this Court to enter the proposed Stipulated Order for Permanent Injunction and Judgment.

Dated: 12/21/2017

Respectfully submitted,

/s/ Rosemary Rosso

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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2017, I electronically filed this MOTION FOR ENTRY STIPULATED ORDER FOR PERMANENT INJUNCTION AND JUDGMENT using the CM/ECF system. I have also sent a copy of this motion via FedEx overnight delivery and electronic mail to counsel for the Defendants:

Austin Lowe, Esq.  
General Counsel  
Partner Fusion, Inc.  
2961 West Maple Loop Drive #300  
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This filing is available for review and download from the Court's CM/ECF system.

By /s/ Rosemary Rosso  
Attorney for Plaintiff Federal Trade Commission