

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
No. 18-cv-60379 (Altman/Hunt)**

**FEDERAL TRADE COMMISSION,**

Plaintiff,

v.

**THOMAS DLUCA, *et al*,**

Defendants.

**JOINT MOTION TO ENTER STIPULATED  
ORDERS FOR PERMANENT INJUNCTION**

Plaintiff Federal Trade Commission (“Plaintiff”) and Defendants Thomas Dluca, Louis Gatto, Eric Pinkston, and Scott Chandler (“Defendants”) respectfully submit the four attached proposed Stipulated Orders For Permanent Injunction (“Stipulated Orders”), each of which have been signed by Plaintiff’s counsel and the Defendant to whom the Stipulated Order applies. The Stipulated Orders collectively resolve all matters in dispute between Plaintiff and Defendants in this action. Plaintiff’s counsel has presented the Stipulated Orders to the full Federal Trade Commission, which has now approved them. Accordingly, Plaintiff and Defendants jointly move the Court to enter the Stipulated Orders.

DATED this 22nd day of August, 2019.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 22, 2019, a true and correct copy of the foregoing document was served through the CM/ECF system or electronic mail to the following parties or counsel:

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