

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

Federal Trade Commission,  
State of Florida,  
State of Indiana,  
State of Iowa,  
State of Montana,  
State of Nebraska,  
State of Texas,  
State of Utah,  
State of West Virginia,

Plaintiffs,

v.

Havas Media Group USA LLC

Defendant.

Case No.: 4:26-cv-804

**JOINT MOTION TO ENTER [PROPOSED] FINAL ORDER AND STIPULATED  
PERMANENT INJUNCTION AS TO HAVAS MEDIA GROUP USA LLC**

The Federal Trade Commission (“FTC” or “Commission”), the States of Florida, Indiana, Iowa, Montana, Nebraska, Texas, Utah, and West Virginia (the “States”) (together with the Commission, “Plaintiffs”), and Defendant Havas Media Group USA LLC (“Havas”), respectfully submit the attached proposed Stipulated Order for Permanent Injunction and Other Relief (“Stipulated Final Order”) to fully resolve this matter.

The Complaint alleges that Defendant Havas violated Section 1 of the Sherman Act, 15 U.S.C. § 1, and Section 5 of the FTC Act, as amended, 15 U.S.C. § 45, concerning Defendant’s agreement to act collectively with co-conspirators, Dentsu US, Inc., GroupM Worldwide LLC

(d/b/a WPP Media), The Interpublic Group of Companies, Inc., Omnicom Group Inc., and Publicis, Inc. in ways that harmed competition and, thus, Defendant Havas engaged in unfair methods of competition. *See* Doc. No. 1. Defendant Havas neither admits nor denies any of the allegations in the Complaint, except as specifically stated in the [Proposed] Final Order and Stipulated Permanent Injunction, and only for purposes of this action, it does not contest jurisdiction in this Court.

The [Proposed] Final Order and Stipulated Permanent Injunction would enjoin the alleged practices. The [Proposed] Final Order and Stipulated Permanent Injunction were signed by Defendant Havas, Defendant's counsel, and Plaintiffs' counsel. Plaintiffs and Defendant Havas respectfully request that this Court enter the Stipulated Final Order.

Dated: June 30, 2026

Respectfully submitted,

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*Attorney for Havas Media Group USA LLC*

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff Federal Trade Commission has conferred with counsel for Plaintiff States and Defendant Havas regarding the foregoing Joint Motion to Enter [Proposed] Final Order and Stipulated Permanent Injunction as to Havas Media Group USA LLC, and this joint motion is unopposed.

Dated: June 30, 2026

/s/ Anne LeJeune  
Anne LeJeune

CERTIFICATE OF SERVICE

I hereby certify that Plaintiff Federal Trade Commission has provided true and correct copies of the foregoing document to all Plaintiff States' counsel of record via email and to Defendant by United States mail and by email at the following addresses:

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