

1 Rebecca Plett (VA Bar No. 90988, NC Bar No. 63273)  
2 Lauren Rivard (NY Reg. No. 5308192)  
3 Federal Trade Commission  
4 600 Pennsylvania Ave., NW, Mailstop CC-6316  
Washington, DC 20580  
(202) 326-3664 / rplett@ftc.gov  
(202) 326-2450 / lrivard@ftc.gov

5 Attorneys for Plaintiff  
6 Federal Trade Commission

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA

9 Federal Trade Commission,  
10 Plaintiff,  
11 v.  
12 Air Ai Technologies, Inc., et al.,  
13 Defendants.  
14

No. 2:25-cv-03068-SMB

UNOPPOSED MOTION TO ENTER  
INTO STIPULATED ORDER FOR  
PERMANENT INJUNCTION,  
MONETARY JUDGMENT, AND  
OTHER RELIEF

15 Plaintiff, the Federal Trade Commission (“Commission”), pursuant to the Court’s  
16 February 10, 2026 Order (Dkt no. 42), respectfully submits for the Court’s review and  
17 entry the proposed Stipulated Order for Permanent Injunction, Monetary Relief, and  
18 Other Relief (“Stipulated Order”) submitted as an attachment hereto which resolves all  
19 matters in dispute in this action. Counsel for all Defendants has authorized Plaintiff to  
20 state that they consent to Plaintiff’s filing of this motion. In support of this motion,  
21 Plaintiff states as follows:  
22  
23

- 24 1. On February 5, 2026, Plaintiff and Defendants filed a Joint Motion to Stay  
25 Proceedings to Consider Settlement Agreement (“Joint Motion”), informing the  
26 Court that Defendants had signed a proposed settlement in the form of a stipulated  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

order that FTC staff was prepared to recommend to the Commission for approval (Dkt no. 41).

2. The Joint Motion described that, pursuant to 16 C.F.R. § 4.14(c), certain FTC actions, including agreeing to settle litigated matters, may only be taken by the affirmative concurrence of a majority of participating Commissioners.
3. On February 10, 2026, the Court entered an order continuing all deadlines and directing the parties to promptly file the proposed settlement agreement with the Court upon approval by the Commission (Dkt no. 42).
4. The Federal Trade Commission has now approved the proposed settlement. Plaintiff respectfully requests that the Court enter the Stipulated Order submitted as an attachment to this motion, and which has been signed by Commission counsel, Defendants, and counsel for all Defendants.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

FOR PLAINTIFF FEDERAL TRADE  
COMMISSION:

Dated: March 24, 2026

/s/ Rebecca Plett  
Rebecca Plett (VA Bar No. 90988, NC Bar  
No. 63273)  
Lauren Rivard (NY Reg. No. 5308192)  
Federal Trade Commission  
600 Pennsylvania Ave., NW,  
Mailstop CC-6316  
Washington, DC 20580  
Plett: (202) 326-3664 / rplett@ftc.gov  
Rivard: (202) 326-2450 / lrivard@ftc.gov

Attorneys for Plaintiff  
Federal Trade Commission