UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

FEDERAL	TRADE	COM	MISSION
LULIVAL	INADL	COLVII	VIIDOIOIN.

Plaintiff,

V.

BLUESNAP, INC., a corporation,

BLUESNAP PAYMENT SERVICES LTD, a corporation,

RALPH DANGELMAIER, individually and as an officer of BLUESNAP, INC., and

TERRY MONTEITH, individually and as an officer of BLUESNAP, INC.,

Defendants.

Case No.

MOTION FOR APPROVAL OF STIPULATED ORDER FOR PERMANENT INJUNCTION, MONETARY JUDGMENTS, AND OTHER RELIEF

Plaintiff, the Federal Trade Commission ("Commission"), has filed its
Complaint for Permanent Injunction, Monetary Judgment, and Other Relief
pursuant to Sections 13(b) and 19 of the Federal Trade Commission Act, 15 U.S.C.
§§ 53(b) and 57b, and the Telemarketing and Consumer Fraud and Abuse Act, 15
U.S.C. §§ 6101-08. Defendants BlueSnap, Inc., BlueSnap Payment Services Ltd,
Ralph Dangelmaier, and Terry Monteith have stipulated to jurisdiction and to the
entry of the attached Stipulated Order for Permanent Injunction, Monetary

Judgments, and Other Relief ("Order") to resolve all matters in dispute in this matter.

Accordingly, the Commission requests that the Court enter the accompanying Order.

Dated: May 1, 2024 Respectfully submitted,

/s/ Alan Bakowski

MARGARET BURGESS
Georgia Bar No. 167433
ALAN BAKOWSKI
Georgia Bar No. 373002
NATALYA RICE
Georgia Bar No. 975012
Federal Trade Commission
233 Peachtree Street, NE, Ste. 1000
Atlanta, GA 30303
(202) 250-4693; mburgess1@ftc.gov
(404) 656-1363; abakowski@ftc.gov
(202) 455-8587; nrice@ftc.gov

Attorneys for Plaintiff FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, I served this Motion for Approval of Stipulated Order for Permanent Injunction, Monetary Judgments, and Other Relief via electronic mail on the following, who are not registered participants of the CM/ECF System in this matter:

Antony P. Kim
Barrie VanBrackle
Latham & Watkins LLP
555 Eleventh Street, NW, Suite 1000
Washington, DC 20015
antony.kim@lw.com
barrie.vanbrackle@lw.com

Scott Joiner Latham & Watkins LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 scott.joiner@lw.com

Attorneys for BlueSnap, Inc. and BlueSnap Payment Services Ltd.

Leonard L. Gordon Venable LLP 151 West 42nd Street New York, NY 10035 llgordon@venable.com Ellen Traupman Berge Venable LLP 600 Massachusetts Avenue, NW Washington, DC 20001 etberge@venable.com

Attorneys for Ralph Dangelmaier and Terry Monteith

/s/ Alan Bakowski
Alan Bakowski
Georgia Bar No. 373002
Federal Trade Commission
233 Peachtree Street, NE, Ste. 1000
Atlanta, GA 30303
(404) 656-1363
abakowski@ftc.gov