

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SHUTTERSTOCK, INC., a corporation,

Defendant.

Case No. 1:26-cv-03955

**JOINT MOTION TO ENTER  
STIPULATED ORDER FOR  
PERMANENT INJUNCTION,  
MONETARY JUDGMENT, AND  
OTHER RELIEF**

Plaintiff Federal Trade Commission (“FTC”) and Defendant Shutterstock, Inc. (“Shutterstock”), respectfully submit the attached proposed Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief, attached as Exhibit A (“Proposed Stipulated Order”) to fully resolve this matter. Furthermore, Defendant has agreed to waive service of the summons and the Complaint.

The Complaint alleges that Shutterstock violated the Federal Trade Commission Act, 15 U.S.C. § 45, and the Restore Online Shoppers’ Confidence Act, 15 U.S.C. § 8403, in connection with the sale of its stock images and other content. *See* Dkt. No. 1. Shutterstock neither admits nor denies any of the allegations in the Complaint, except as specifically stated in the Proposed Stipulated Order. The Proposed Stipulated Order would enjoin the alleged practices and provide for a judgment of thirty-five million dollars (\$35,000,000), which Plaintiff will use to redress consumers. Plaintiff and Defendant respectfully request that this Court enter the Stipulated Order.

Respectfully submitted,

Dated: May 13, 2026

**FOR THE FEDERAL TRADE  
COMMISSION**



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