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23 **UNITED STATES DISTRICT COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**

25 **UNITED STATES OF AMERICA,**

26 Plaintiff,

27 v.

28 **GOODRX HOLDINGS, INC.,** a corporation,
also d/b/a GoodRx Gold, GoodRx Care,
HeyDoctor, and HeyDoctor by GoodRx,

Defendant.

Case No. 3:23-cv-460

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED
ORDER**

Plaintiff, the United States of America and Defendant, GoodRx Holdings, Inc. (herein, “the Parties”) have resolved all issues in this matter by the Proposed Stipulated Order for Permanent

1 Injunction, Civil Penalty Judgment, and Other Relief, attached as Exhibit A (“Stipulated Proposed
2 Order”), signed at pages 27 through 28. The Parties submit that good cause exists for the Court to
3 enter the Stipulated Proposed Order. Specifically, the Stipulated Proposed Order will provide just
4 relief on the allegations in the Complaint, and it will provide appropriate protections to prevent
5 future violations of the Federal Trade Commission Act, 15 U.S.C. § 41 et. seq., and the Heath
6 Breach Notification Rule, 16 C.F.R. § 318.

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8 Accordingly, the Parties respectfully request that the Court enter the Stipulated Proposed
9 Order, which will resolve all of the claims in the Complaint.

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13 Dated: February 1, 2023

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15 Respectfully submitted,

16 FOR DEFENDANT:

16 FOR THE UNITED STATES OF AMERICA:

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** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document has obtained concurrence from all parties to the filing of this motion.