

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:14-cv-00815-BCW
)	
BF LABS, INC., et al.,)	
)	
Defendants.)	

**STIPULATED MOTION TO STAY CASE FOR 120 DAYS
TO CONSIDER SETTLEMENT AGREEMENT**

Come now Plaintiff Federal Trade Commission (“FTC”) and Defendants BF Labs, Inc. (“BF Labs”), Sonny Vleisides, and Darla Jo Drake (“Defendants”), by and through their undersigned counsel, and hereby agree, stipulate, and move the Court for an order staying all deadlines in this case for 120 days, including staying all deadlines currently set forth in the Amended Scheduling Order (Dkt. No. 302). In support of this request, the parties state as follows:

1. Defendants BF Labs, Vleisides, and Drake (“Settling Defendants”) and FTC counsel have negotiated a settlement in this matter. Although FTC counsel has authority to negotiate settlement agreements, under Section 4.14 of the FTC’s Rules of Practice, 16 C.F.R. § 4.14(c), only a majority vote by the FTC Commissioners can approve any such agreement.
2. If the FTC approves the settlements, further litigation in this matter as to the Settling Defendants will not be necessary. Because the FTC’s review and approval process can take several weeks, the parties respectfully request that the Court stay the case for 120 days to allow adequate time for the FTC to review and approve the final settlement.

3. The FTC and Settling Defendants submit that they will diligently seek to conclude the matters between them in order to submit the final resolution to the FTC Commissioners in a timely fashion.

4. Counsel for Defendant Ghoseiri has been contacted concerning the referenced stay but has not yet responded.

5. Although FTC counsel and Defendant Ghoseiri have not reached settlement, the parties request that the stay apply as between them as well to allow for possible negotiations.

6. The stipulated stay would further the interests of judicial economy by facilitating the resolution of this matter without judicial intervention.

Wherefore, based on the foregoing, the FTC and Defendants respectfully request that this stipulation be granted and the entire case be stayed for 120 days.

Dated: October 29, 2015

Respectfully submitted,

/s/ Helen Wong

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*Attorneys for Defendants BF Labs, Inc.,
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 30th day of October, 2015, to all counsel of record.

/s/ Mark A. Olthoff

Attorney for Defendants BF Labs, Inc., Sonny
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