

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-------------------------------------------|---|-----------------------|
| _____ |) | |
| FEDERAL TRADE COMMISSION |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 2:24-CV-4949 |
| |) | |
| EMPIRE HOLDINGS GROUP LLC, |) | |
| d/b/a ECOMMERCE EMPIRE BUILDERS |) | |
| and STOREFUNNELS.NET, a limited liability |) | |
| company, and PETER PRUSINOWSKI |) | |
| Individually and as officer of |) | |
| Empire Holdings Group LLC, |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

**JOINT MOTION TO EXTEND TEMPORARY RESTRAINING ORDER
AND CONTINUE THE HEARING TO SHOW CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT ISSUE**

Plaintiff Federal Trade Commission (“Plaintiff”) and Defendants Empire Holdings Group LLC d/b/a E-Commerce Empire Builders and Storefunnels.net (“EEB”) and Peter Prusinowski (“Prusinowski”) (EEB and Prusinowski, collectively “Defendants”) (Plaintiff and Defendants each, individually, a “Party”, and collectively, the “Parties”), by counsel, jointly move the Court to enter an order: (i) extending the September 20, 2024 Temporary Restraining Order (ECF No. 19) (“TRO”); and (ii) continuing the preliminary injunction hearing currently set for October 7, 2024 to take place no earlier than November 4, 2024.

The FTC filed a Complaint (ECF No. 1) and Emergency Noticed Motion for Temporary Restraining Order (ECF No. 2) in this matter on September 18, 2024. The Court set a hearing on September 20, 2024, during which the Court entered the TRO and set a hearing for Monday, October 7, 2024 to show cause why a preliminary injunction should not issue. (ECF No. 19).

The Parties jointly request a four-week continuance of the show cause hearing because Defendants require more time to prepare; Plaintiff and Defendants' counsel have recently begun settlement discussions and would use a four-week extension to continue these discussions such that the relief requested may help the Parties to conserve their respective resources and minimize any burden on the Court's resources.

The Parties have agreed that, absent other order of the Court, the TRO entered September 20, 2024 would remain in effect. The Parties have also agreed that the relief requested herein is without prejudice to any Party's rights, including Defendants' Motions to Dismiss (ECF No. 23) and Motion to Amend the TRO (ECF No. 24), as well as any motion to modify the asset freeze to allow release of discrete funds for Mr. Prusinowski's family expenses and attorneys' fees. Further, if the Court wishes to rule on Defendants' Motion to Amend the TRO (ECF No. 24) before the preliminary injunction hearing, the Parties jointly request oral argument.

WHEREFORE, Plaintiff and Defendants jointly request that the Court enter an order: (i) extending the TRO; and (ii) continuing the preliminary injunction hearing currently set for October 7, 2024 to take place no earlier than November 4, 2024.

[SIGNATURES ON NEXT PAGE]

Date: October 3, 2024

Respectfully submitted,

/s/ Amanda Grier

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*Counsel for Defendants
Empire Holdings Group LLC and
Peter Prusinowski*

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 3rd day of October 2024 the foregoing Joint Motion to Extend Temporary Restraining Order and Continue Preliminary Injunction Hearing and proposed Order granting same was electronically filed via the Court's ECF system pursuant to the agreement of the Parties, and was thereby served upon all counsel of record.

By: /s/ Ryan M. Poteet
Ryan M. Poteet

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| Empire Holdings Group LLC, |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

**[PROPOSED] ORDER ON JOINT MOTION TO EXTEND TEMPORARY
RESTRAINING ORDER AND CONTINUE PRELIMINARY INJUNCTION HEARING**

THIS MATTER having come before the Court on the Parties' Joint Motion to Extend Temporary Restraining Order and Continue Preliminary Injunction Hearing, and the Court having considered the matter, it is hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the October 7, 2024 preliminary injunction hearing is hereby rescheduled to _____; and it is further

ORDERED that the Temporary Restraining Order shall remain in effect until _____ unless otherwise modified or rescinded by the Court.

SO ORDERED.

Dated: _____

WENDY BEETLESTONE, J.
United States District Judge