

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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC, also d/b/a
ECOMMERCE EMPIRE BUILDERS and
STOREFUNNELS.NET, a limited liability
company, and

PETER PRUSINOWSKI, aka PETER PRU,
individually and as an officer of Empire Holdings
Group LLC,

Defendants.

Case No. 2:24-CV-4949

**CONSENT MOTION TO STAY DEADLINES WHILE PROPOSED SETTLEMENT IS
REVIEWED BY COMMISSION**

Plaintiff the Federal Trade Commission (“FTC”) respectfully submits this Consent Motion requesting a stay of all deadlines as to the FTC’s case against Defendants in this matter until June 12, 2025, pending Commission review of a Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief as to Defendants (“proposed stipulated order”). In support of this Motion, Plaintiff states the following:

1. The FTC and all Defendants, through counsel, have agreed to resolve the FTC’s claims against Defendants by the proposed stipulated order, which all Defendants have signed.
2. All settlements negotiated by FTC staff must be reviewed and approved by a vote of the Commission. The Commission’s review and consideration process is likely to take approximately six to ten weeks.

3. Without a stay of the litigation, Plaintiff and Defendants will continue to incur costs, including preparing for discovery and trial. These costs will be unnecessary should the parties' proposed stipulated order be approved by the Commission and this Court.

4. In addition, granting the requested stay will also serve the interests of judicial economy. Approval and entry of the proposed stipulated order will resolve this case.

5. For these reasons, Plaintiff and Defendants request that the Court stay all proceedings in this case until June 12, 2025. The proposed stay should not apply to the activities of the Receiver, including activities taken pursuant to the Stipulated Preliminary Injunction (ECF No. 49).

6. If the Commission approves the proposed stipulated order, FTC counsel will immediately file it with the Court. If the Commission does not approve the proposed stipulated order, the parties will notify the Court and move to lift the stay.

7. All Defendants and the Receiver consent to this Motion.

WHEREFORE, the FTC requests that all case deadlines as to the FTC and Defendants be stayed until June 12, 2025, pending Commission review of the proposed stipulated order.

Respectfully submitted,

Dated: April 10, 2025

COUNSEL FOR PLAINTIFF:

/s/ Ryan A. McAuliffe
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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2025, I caused a copy of the foregoing **CONSENT MOTION TO STAY DEADLINES WHILE PROPOSED SETTLEMENT IS REVIEWED BY COMMISSION** to be served on all counsel of record by Operation of the Court's electronic filing system.

/s/ Ryan A. McAuliffe

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**[PROPOSED] ORDER GRANTING
CONSENT MOTION REQUESTING
TO STAY CASE TO CONSIDER
SETTLEMENT AGREEMENT**

Before the Court is Plaintiff Federal Trade Commission's ("FTC") consent motion to stay all deadlines until June 12, 2025, as to Federal Trade Commission's case against Defendants to consider and vote on the terms of the proposed final settlement agreement in this matter. All Parties and the Receiver consent to this motion. The Court has reviewed and considered Plaintiff's motion. It is hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that this case and all applicable deadlines set forth in the Scheduling Order (ECF No. 68) are hereby STAYED until June 12, 2025; and it is further

ORDERED that the proposed stay should not apply to the activities of the Receiver, including activities taken pursuant to the Stipulated Preliminary Injunction (ECF No. 49); and it is further;

ORDERED that Parties will notify this Court when the Federal Trade Commission has voted on the proposed final settlement agreement for this matter or provide a status report by June 12, 2025, if the vote has not been completed by that date.

SO ORDERED, this _____ day of _____, 2025.

WENDY BEETLESTONE, J.
United States District Judge