

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

In re SANCTUARY BELIZE LITIGATION

No: 18-cv-3309-PJM

**MOTION FOR ENTRY OF PROPOSED ORDER PARTIALLY IMPLEMENTING THE
PROPOSED REDRESS PLAN**

Pursuant to the Court’s oral directive during yesterday’s status conference and its paperless order, ECF No. 1359, Plaintiff Federal Trade Commission (“FTC”) submits the attached proposed order. The proposed order states that: (1) the FTC’s motion for entry of a redress plan (ECF No. 1117) is partially granted; (2) the effective date of the redress plan is September 12, 2022, which will allow the Receiver to finalize its processes for outreach efforts, as discussed during the status conference; (3) the Receiver shall then engage with consumers to implement the first 150 days of the Redress Plan, which are specified in Section II – Section III.A. of ECF No. 1117-1, pursuant to the definitions contained in Section I of the redress plan; (4) after undertaking the foregoing, the Receiver shall not take any further steps to implement the plan without further order of the Court; and (5) the Receiver shall submit a separate report about the status of the implementation of the redress plan within 180 days of September 12, 2022.

Dated: July 28, 2022

Respectfully Submitted,

/s/ Christopher Erickson
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Certificate of Service

I hereby certify that on July 28, 2022, I caused to be served the foregoing, and all related documents, through the Court's electronic filing system ("ECF") and otherwise on the following people and entities by email at the email addresses provided:

Gary Caris, James E. Van Horn, and Kevin Driscoll, counsel for the Receiver, by ECF or at gcaris@btlaw.com; jvanhorn@btlaw.com; kevin.driscoll@btlaw.com;

John B. Williams, by ECF or at jbwilliams@williamslopatto.com, counsel for Defendants;

Neil H. Koslowe, by ECF or at nkoslowe@potomaclaw.com, counsel for Defendants;

Larry J. Dreyfuss, larry@dreyfusslaw.com, counsel for Luke Chadwick; and

Shon Hopwood and Kyle Singhal, by ECF or at shon@hopwoodsinghal.com and kyle@hopwoodsinghal.com, counsel for proposed intervenors

/s/ Christopher Erickson

**IN THE UNITED STATES DISTRICT COURT
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No: 18-cv-3309-PJM

[PROPOSED] ORDER REGARDING IMPLEMENTATION OF THE REDRESS PLAN

On January 21, 2021, Plaintiff the Federal Trade Commission (“FTC”) submitted a proposed redress plan. *See* ECF No. 1117 (motion) and ECF No. 1117-1 (the “Redress Plan”). On July 27, 2022, the Court held a status conference, in which it discussed the implementation of the Redress Plan with counsel for the FTC, counsel for the Receiver, the Receiver, and Defendants’ counsel. At this status conference, the Court orally ordered that the Receiver is authorized to begin implementing the Redress Plan. Being duly advised, and for good cause shown, **IT IS HEREBY ORDERED:**

- A. The FTC’s motion is **PARTIALLY GRANTED**.
- B. The effective date of the Redress Plan is September 12, 2022.
- C. The Receiver shall then engage with consumers to implement the first 150 days of the Redress Plan, which are specified in Section II – Section III.A. of ECF No. 1117-1, pursuant to the definitions contained in Section I of the Redress Plan.
- D. After undertaking the foregoing, the Receiver shall not take any further steps to implement the Redress Plan without further order of the Court.
- E. Within 180 days of the September 12, 2022 effective date of the Redress Plan, the Receiver shall submit a separate report to the Court concerning the status of implementation of the Redress Plan.

SO ORDERED, this ____ day of _____, 2022.

UNITED STATES DISTRICT JUDGE