### IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

# UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:23-cv-3107

EASY HEALTHCARE CORPORATION, a corporation, d/b/a EASY HEALTHCARE,

Defendant.

# MOTION FOR ENTRY OF STIPULATED ORDER FOR PERMANENT INJUNCTION, CIVIL PENALTY JUDGMENT, AND OTHER RELIEF

Plaintiff, the United States of America ("Plaintiff") herby files its "Motion for Entry of

Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief"

("Order") r

#### Case: 1:23-cv-03107 Document #: 3 Filed: 05/17/23 Page 2 of 3 PageID #:33

the entry of this Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other

Relief ("Order") to resolve all matters in dispute in this action between them." Dkt. at 1.

WHEREFORE, Plaintiff respectfully request that the Court enter the Order.

Respectfully submitted,

Dated: May 17, 2023

<u>/s/ Rachel E. Baron</u> RACHEL E. BARON Trial Attorney Consumer Protection Branch 450 5<sup>th</sup> Street NW Washington, D.C. 20530 (202) 598-7719

Attorney for Plaintiff UNITED STATES OF AMERICA

OF COUNSEL:

#### FOR THE FEDERAL TRADE COMMISSION

TIFFANY GEORGE Acting Assistant Director Division of Privacy and Identity Protection

DAVID WALKO RONNIE SOLOMON Attorneys Division of Privacy and Identity Protection Federal Trade Commission 600 Pennsylvania Avenue NW Mail Stop CC-8232 Washington, DC 20580 (202) 326-2880 (202) 326-2098 dwalko@ftc.gov rsolomon@ftc.gov

### **CERTIFICATE OF SERVICE**

I, Rachel Baron, an attorney, hereby certify that on May 17, 2023, I caused to be served true copies of the foregoing Motion for Entry of Stipulated Order for Permanent Injunction and Monetary Order through the CM/ECF System by e-mail and U.S. Mail on the following counsel for Defendant Easy Healthcare Corporation:

Brenda R. Sharton Dechert LLP One International Place, 40th Floor Boston, MA 02110 Brenda.Sharton@dechert.com

Benjamin M. Sadun Dechert LLP 633 West 5th Street, Suite 4900 Los Angeles, CA 90071 Benjamin.Sadun@dechert.com

Hilary Bonaccorsi Dechert LLP 300 South Tryon Street, Suite 800 Charlotte, NC 28202 Hilary.Bonaccorsi@dechert.com

/s/ Rachel E. Baron

RACHEL E. BARON Trial Attorney Consumer Protection Branch 450 5<sup>th</sup> Street NW Washington, D.C. 20530 (202) 598-7719

Attorney for Plaintiff