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24 and Specially Appearing as Attorneys
25 for the Individual Defendants
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

<p>FEDERAL TRADE COMMISSION,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNIVERSAL CITY NISSAN, INC., et al.</p> <p style="text-align: right;">Defendants.</p>	<p>Case no 2:16-cv-07329-CAS(AJWx) <i>Honorable Christina A. Snyder</i></p> <p>STIPULATION TO ENTRY OF PRELIMINARY INJUNCTION ORDER</p> <p>Date: November 14, 2016 Time: 10:00 a.m. Courtroom: 5, 312 N. Spring St.</p>
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Plaintiff, the Federal Trade Commission (“FTC”) and Defendants Covina MJL, LLC, also d/b/a Sage Covina Chevrolet; Glendale Nissan/Infiniti, Inc., also d/b/a Glendale Infiniti and d/b/a Glendale Nissan; Sage Downtown, Inc., also d/b/a Kia Of Downtown Los Angeles; Sage Holding Company, Inc.; Sage Management Co., Inc.; Sage North Hollywood, LLC, also d/b/a Sage Pre-Owned; Sage Vermont, LLC, also d/b/a Sage Hyundai; Universal City Nissan, Inc., also d/b/a Universal Nissan; Valencia Holding Co., LLC, also d/b/a Mercedes-Benz Of Valencia; West Covina Auto Group, LLC, also d/b/a West Covina Toyota and d/b/a West Covina Toyota/Scion; West Covina Nissan, Inc.; Joseph Schrage, a/k/a Joseph Sage; Leonard Schrage, a/k/a Leonard Sage, and Michael Schrage, a/k/a Michael Sage (collectively, “Defendants”) respectfully request that the Court enter the attached Stipulated Preliminary Injunction (“Order”), appended hereto as Attachment A.

The FTC filed a Complaint on September 29, 2016 seeking a permanent injunction and other equitable relief pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b). The Complaint alleges that

1 Defendants operated a common enterprise that has deceptively and unlawfully
2 advertised offers to purchase, finance, and lease vehicles and engaged in deceptive
3 and unfair practices involving the financing of vehicles. The Complaint also
4 alleges that Defendants posted and used deceptive online reviews that are often
5 fake or do not disclose the material fact that they are written by Defendants’
6 employees or agents. The Commission’s Complaint further alleges that
7 Defendants’ deceptive and unfair practices violate Section 5(a) of the FTC Act, 15
8 U.S.C. §45(a); the Truth in Lending Act (“TILA”), 15 U.S.C. §§ 1601-1666j, and
9 its implementing Regulation Z, 12 C.F.R. § 226; and the Consumer Leasing Act
10 (“CLA”), 15 U.S.C. §§ 1667-1667f, and its implementing Regulation M, 12 C.F.R.
11 § 213.

12 The Commission, on October 6, 2016, filed a Motion for a Preliminary
13 Injunction and Other Equitable Relief (“Motion”) against Defendants, seeking
14 preliminary relief in connection with the acts and practices alleged in the
15 Complaint relating to Counts I-II and VII-IX.

16 On October 24, 2016, the Commission and Defendants stipulated and agreed
17 to entry of the Order. The parties respectfully request that the Court enter the
18 Order and that the Court cancel the hearing calendared for 10:00 am on Monday,
19 November 14, 2016.

20 Date: October 24, 2016

Respectfully submitted,

21
22 /s/ Thomas J. Widor

23 Thomas J. Widor

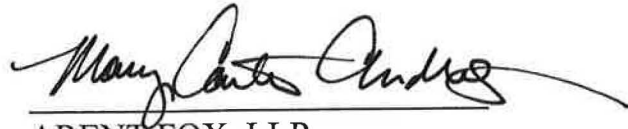
24 Daniel Dwyer

25 Thomas J. Syta

26 Attorneys for Plaintiff

27 FEDERAL TRADE COMMISSION

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Aaron H. Jacoby

Mary Carter Andrues

Victor P. Danhi

Attorneys for Defendants

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Joseph Schrage, Individually

Leonard Schrage, Individually


Michael Schrage, Individually

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Nissan, Inc., also d/b/a Universal Nissan;
Valencia Holding Co., LLC, also d/b/a
Mercedes-Benz Of Valencia; West Covina
Auto Group, LLC, also d/b/a West Covina
Toyota and d/b/a West Covina
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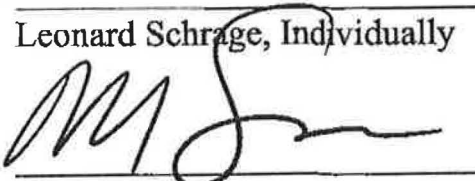
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Toyota/Scion; West Covina Nissan, Inc.

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