

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**FILED**  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.

★ JUN 03 2019 ★

BROOKLYN OFFICE

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

CURE ENCAPSULATIONS, INC., *et al.*,

Defendants.

Case No. 19-cv-982 (LDH) (ST)

**JOINT MOTION FOR ENTRY OF STIPULATED ORDER  
FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT**

Plaintiff, the Federal Trade Commission ("FTC"), and defendants, Cure Encapsulations, Inc. and Naftula Jacobowitz ("Defendants"), respectfully and jointly move the Court for entry of the attached Stipulated Order for Permanent Injunction and Monetary Judgment. In support of this motion, the parties state as follows:

1. On February 19, 2019, the FTC filed a Complaint for Permanent Injunction and Other Equitable Relief against Defendants pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), alleging deceptive marketing practices and false advertising in violation of Sections 5(a) and 12 of the FTC Act, 15 U.S.C. §§ 45(a) and 52.

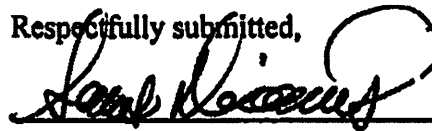
2. The FTC and Defendants, having been represented by counsel and acting by and through such counsel, have consented to the entry of a proposed Stipulated Order for Permanent Injunction and Monetary Judgment, attached as Exhibit 1 hereto, without a trial or adjudication of any issue of law or fact. The parties will email chambers a word processing version of the proposed Order pursuant to Rule II.C of the Court's Individual Practice Rules.

3. Entry of this Stipulated Order for Permanent Injunction and Monetary Judgment would resolve this matter in full, except the Court would retain jurisdiction for the purpose of enforcement of the Order.

WHEREFORE, the parties respectfully move this Court to enter the attached Stipulated Order for Permanent Injunction and Monetary Judgment.

Dated: 2/19/2019

Respectfully submitted,



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*Attorney for Plaintiff  
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**So Ordered**

s/ LDH

~~Lasham DeArcy Hall~~  
United States District Judge



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