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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ASCEND CAPVENTURES INC., et
al.,

Defendants.

No. 2:24-CV-07660-SPG-JPR

**NOTICE OF MOTION AND
JOINT MOTION TO STAY
PROCEEDINGS PENDING
APPROVAL BY FTC
COMMISSIONERS OF
PROPOSED STIPULATED
ORDER FOR PERMANENT
INJUNCTION AND MONETARY
JUDGMENT**

Hearing Date: April 23, 2025 at
1:00 pm (Parties waive rights to
hearing on joint motion)

Plaintiff Federal Trade Commission (“FTC” or “Plaintiff”) and Defendants,
Ascend Capventures Inc., Ascend Ecommerce Inc., Ascend Administration Inc.,
Ascend Ecom LLC, Ascend Distribution LLC, William Michael Basta, and Jeremy

1 Kenneth Leung (the “Parties”) hereby request that the Court stay this case pending
2 approval of the full Commission of a proposed stipulated order for permanent
3 injunction and monetary judgment (“proposed final settlement”). As reasons
4 therefore, the parties state:

5 1. Plaintiff and Defendants have reached agreement on a proposed final
6 settlement, which Defendants and their counsel have signed.

7 2. Plaintiff will now submit the proposed final settlement to the FTC
8 Commissioners for review and approval. Counsel for the Plaintiff is informed and
9 believes that it may take between eight and twelve weeks to complete this review
10 and obtain Commission approval.

11 3. Granting the stay will serve the interests of judicial economy and
12 allow the parties to avoid the costs of litigation, including discovery, motions
13 practice, and preparing for trial. Approval and entry of the proposed final
14 settlement will resolve all issues between the parties in this case.

15 4. The proposed stay would not apply to the ongoing administrative
16 activities of the court-appointed Receiver, Stephen Donell. Nor would it preclude
17 the parties from addressing any issues or filing any documents relating to the
18 Receivership or the Receiver’s filings during the stay period.

19 Accordingly, Plaintiff and Defendants respectfully request that the Court
20 stay the proceedings in this case until further notice from the Plaintiff.

21 A declaration of counsel and proposed order are submitted with this joint
22 motion.

23 The parties waive their rights to a hearing on this joint motion.
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SIGNATURE CERTIFICATION

In accordance with Civil Local Rule 5-4.3.4(a)(2)(i), the filer hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

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Dated: March 14, 2025

Respectfully submitted,

/s/ Elsie B. Kappler

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2025, I electronically filed the foregoing **JOINT MOTION TO STAY PROCEEDINGS PENDING APPROVAL BY FTC COMMISSIONERS OF PROPOSED STIPULATED ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT AS TO ALL DEFENDANTS** with the Clerk of the Court using CM/ECF, which will cause a copy of the same to be served on the following parties entitled to service:

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