

Blakeley E. Griffith, Esq. (NV Bar #12386)
 Bradley T. Austin, Esq. (NV Bar #13064)
 SNELL & WILMER L.L.P.
 1700 South Pavilion Center Drive, Suite 700
 Las Vegas, Nevada 89135
 Telephone: 702.784.5200
 Facsimile: 702.784.5252
bgriffith@swlaw.com
baustin@swlaw.com

Benjamin W. Reeves, Esq. (*pro hac vice forthcoming*)
 SNELL & WILMER L.L.P.
 1 East Washington St., Suite 2700
 Phoenix, AZ 85004
 Telephone: 602-382-6000
breeves@swlaw.com

Attorneys for the Individual Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION and
 STATE OF NEVADA,

Plaintiffs,

v.

AMERICAN TAX SERVICE LLC, a limited liability company, AMERICAN TAX SOLUTIONS, a corporation, AMERICAN TAX SOLUTIONS LLC, a limited liability company, ATS TAX GROUP LLC, a limited liability company, ELITE SALES SOLUTIONS, a corporation, also d/b/a AMERICAN TAX SERVICE, GETATAXLAWYER.COM LLC, a limited liability company, TNT HOLDINGS GROUP LLC, a limited liability company, TNT SERVICES GROUP LLC, a limited liability company, TNT TAX ASSOCIATES INC., a corporation, TERRANCE SELB, individually and as an officer of American Tax Service LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, Elite Sales Solutions, GetATaxLawyer.com LLC, TNT Holdings Group LLC, TNT Services Group LLC, and TNT Tax Associates Inc., and TYLER BENNETT, individually and as an officer of American Tax Service LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, Elite Sales Solutions,

Case No.: 2:25-cv-01894-GMN-EJY

STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING ON ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE

GetATaxLawyer.com LLC, TNT Holdings Group LLC, TNT Services Group LLC, and TNT Tax Associates Inc.

Defendants.

Counsel for (a) Plaintiffs The Federal Trade Commission and State of Nevada, (b) the Court-Appointed Receiver over Defendants American Tax Service, LLC, American Tax Solutions, American Tax Solutions LLC, ATS Tax Group LLC, Elite Sales Solutions, GetATaxLawyer.com LLC, TNT Holdings Group LLC, TNT Services Group LLC, TNT Tax Associates Inc., and each of their respective subsidiaries, affiliates, successors, and assigns (collectively, “the Receivership Entities”), and (c) Defendants Terrance Selb and Tyler Bennett (“the Individual Defendants”) hereby stipulate as follows:

STIPULATION

1. On October 6, 2025, Plaintiffs filed *Plaintiffs’ Ex Parte Motion for a Temporary Restraining Order* (“Motion”).

2. Thereafter the Court entered an *Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue* (“Appointment and TRO”).

3. The Appointment and TRO provides, in pertinent part, that Defendants are to appear before the Court on October 20, 2025, to show cause why the Court should not enter a preliminary injunction against Defendants continuing the injunctive relief provided for by the temporary restraining order.

4. The Appointment and TRO also appointed Stephen J. Donell as Receiver over the Receivership Entities.

5. The Appointment and TRO provides Defendants must file any responsive pleading to the Motion no later than four (4) days prior to the order to show cause hearing.

6. The Individual Defendants were served with the Motion and Appointment and TRO on Friday, October 10, 2025.

7. The Individual Defendants retained the law firm Wiley Petersen late in the afternoon of Monday, October 13, 2025.

8. The Individual Defendants subsequently retained the law firm Snell & Wilmer on

Thursday, October 16, 2025.

9. Counsel for Plaintiffs, the Receiver, and the Individual Defendants have had discussions related to the matters raised in the Motion, the exhibits appended thereto, and the Individual Defendants' retention of counsel, and have agreed to continue the Hearing on the Order to Show Cause Why a Preliminary Injunction Should Not Issue and stipulate as follows:

- a. The Hearing on the Order to Show Cause Why a Preliminary Injunction Should Not Issue is continued to Monday, October 27, at 9:00 a.m.
- b. The Individual Defendants' deadline to file a responsive pleading to the Motion is continued to Thursday, October 23, 2025.
- c. Plaintiffs may file responsive or supplemental pleadings, materials, affidavits, or memoranda with the Court and serve the same on counsel for Defendants no later than one (1) day prior to the order to show cause hearing as initially provided in the Appointment and TRO.
- d. The Individual Defendants' deadline to deliver to Plaintiffs' counsel and the Receiver completed financial statements is continued to Friday, October 17, 2025.
- e. All other provisions of the Appointment and TRO, including with respect to the appointment of the Receiver, will remain in full force and effect, and the Individual Defendants hereby consent to extend the Appointment Order and TRO pursuant to FRCP 65(b)(2), until the Court rules on the Order to Show Cause Why a Preliminary Injunction Should Not Issue.

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DATED: _____

[Approval and Consented to on following page]

1 APPROVED AND CONSENTED TO:

2
3 /s/ Simon Barth

4 Simon Barth (MA Bar 706122/DC Bar 90035761)
5 James E. Evans (VA Bar 83866)
6 Federal Trade Commission
7 600 Pennsylvania Avenue NW
8 Mailstop CC-6316/1144
9 Washington, DC 20580
10 202.326.3317
11 Email: sbarth@ftc.gov
12 james.evans@ftc.gov

13 Attorneys for Plaintiff Federal Trade Commission

/s/ Ziwei Zheng

Ziwei Zheng (NV Bar 16351)
Samantha B. Feeley (NV Bar 14034)
Nevada Attorney General
8945 W. Russell Road
Suite 204
Las Vegas, Nevada 89148
702.486.6021
Email: zzheng@ag.nv.gov
sfeeley@ag.nv.gov

Attorneys for Plaintiff State of Nevada

14
15 /s/ Ted Fates

16 Ted Fates (CA Bar XXXXX)
17 Joshua del Castillo (CA Bar XXXXX)
18 Allen Matkins
19 600 West Broadway
20 27th Floor
21 San Diego, California 92101
22 619.233.1155
23 Email: tfates@allenmatkins.com
24 jdelcastillo@allenmatkins.com

25 Attorneys for Court-Appointed Receiver

/s/ Blakeley E. Griffith

Blakeley E. Griffith (NV Bar #12386)
Bradley T. Austin (NV Bar #13064)
Snell & Wilmer
1700 South Pavilion Center Drive,
Suite 700
Las Vegas, Nevada 89135
702.784.5200
Email: bgriffith@swlaw.com
baustin@swlaw.com

Attorneys for Individual Defendants