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

<p>22 FEDERAL TRADE COMMISSION,          23 Plaintiff,          24 v.          25 UNIVERSAL CITY NISSAN, INC, et          26 al.          27 Defendants.</p>	<p>Case no 2:16-cv-07329-CAS(AJWx)  <i>Honorable Christina A. Snyder</i></p> <p><b>FEDERAL TRADE          COMMISSION’S NOTICE OF          MOTION AND MOTION FOR          PRELIMINARY INJUNCTION</b></p> <p>Date: November 14, 2016          Time: 10:00 a.m.          Courtroom: 5, 312 N. Spring St.</p>
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1 **TO THE COURT, DEFENDANTS, AND ALL OTHER INTERESTED**  
2 **PARTIES:**

3 Pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), Federal Rule  
4 of Civil Procedure 65, and LR 65-1, Plaintiff Federal Trade Commission (“FTC”)  
5 respectfully moves this Court for a preliminary injunction order:

- 6 1. Prohibiting Defendants from continuing to engage in unlawful conduct in  
7 violation of the FTC Act, the Truth in Lending Act, and the Consumer  
8 Leasing Act;
- 9 2. Preliminarily restraining and enjoining Defendants from destroying or  
10 concealing documents;
- 11 3. Preliminarily disabling deceptive online reviews;
- 12 4. Requiring Defendants to provide notice of certain financial transactions,  
13 new entities, and litigation to preserve the availability of funds for injured  
14 consumers and to prevent the dissipation of funds; and
- 15 5. Ordering any additional relief necessary to preserve the status quo and to  
16 monitor and ensure order compliance.

17 As grounds for this motion, and as further set out in the accompanying  
18 memorandum, declaration of Joseph Weber, and exhibits, Defendants have  
19 engaged and have persisted in deceptive acts and practices, including deceptive  
20 advertising and fake online reviews, in violation of the FTC Act, the Truth in  
21 Lending Act, and the Consumer Leasing Act. The relief sought by the FTC in this  
22 motion is necessary to prevent continued harm to the public and to preserve this  
23 Court’s ability to issue full and final equitable relief, including consumer redress.

24 The motion will be heard on November 14, 2016 at 10:00 a.m., or any other  
25 date and time thereafter convenient to the Court, in Courtroom 5, 2nd floor, of this  
26 Court located at 312 N. Spring Street, Los Angeles, California 90012.

27 [SIGNATURE PAGE FOLLOWS]

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Date: October 6, 2016

Respectfully submitted,

/s/ Daniel Dwyer  
Thomas J. Widor  
Daniel Dwyer  
Thomas J. Syta

Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION