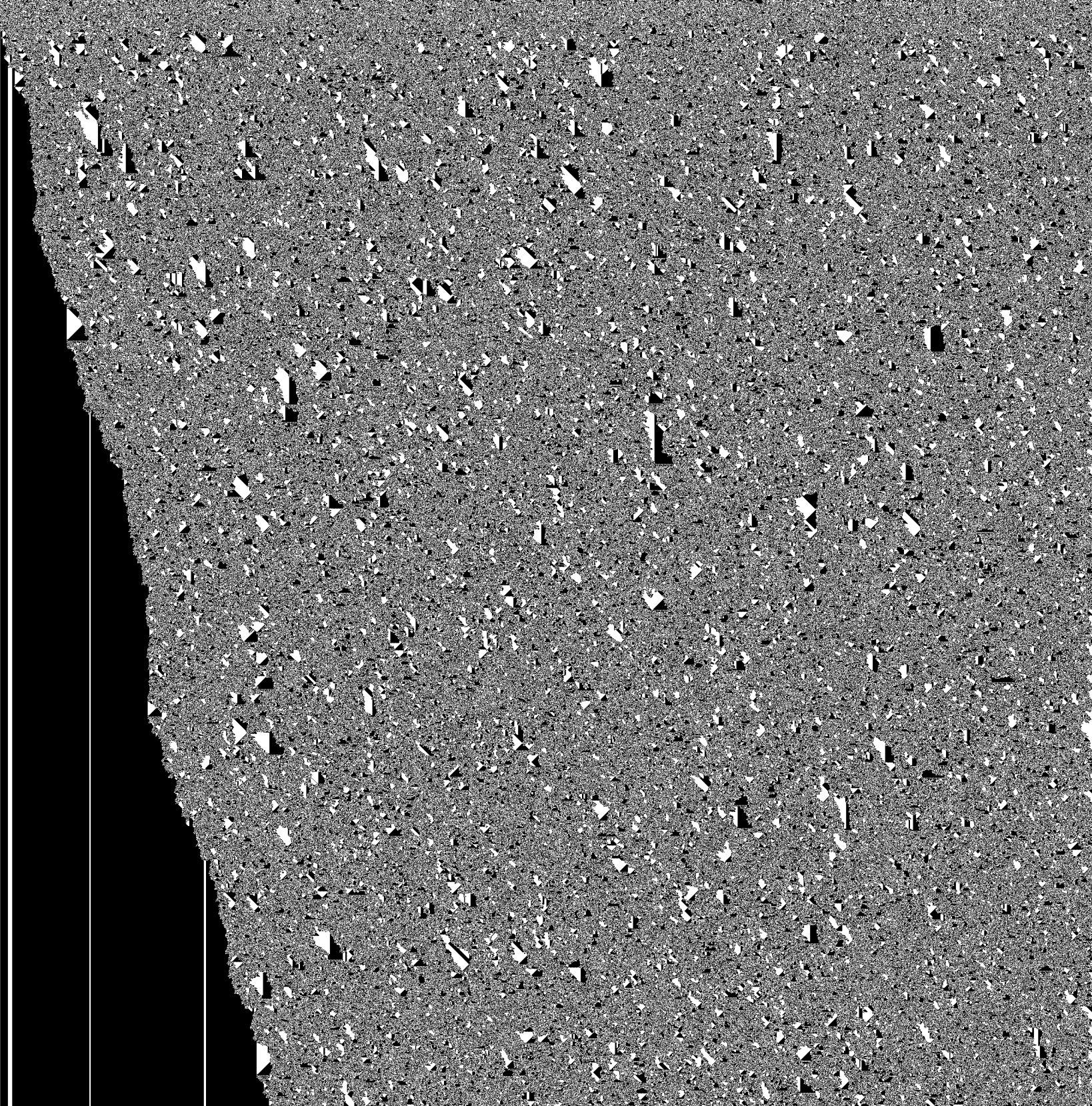


C. The Court Should Enjoin Defendants From Destroying Evidence and Allow Plaintiff to Take Limited Expedited Discovery

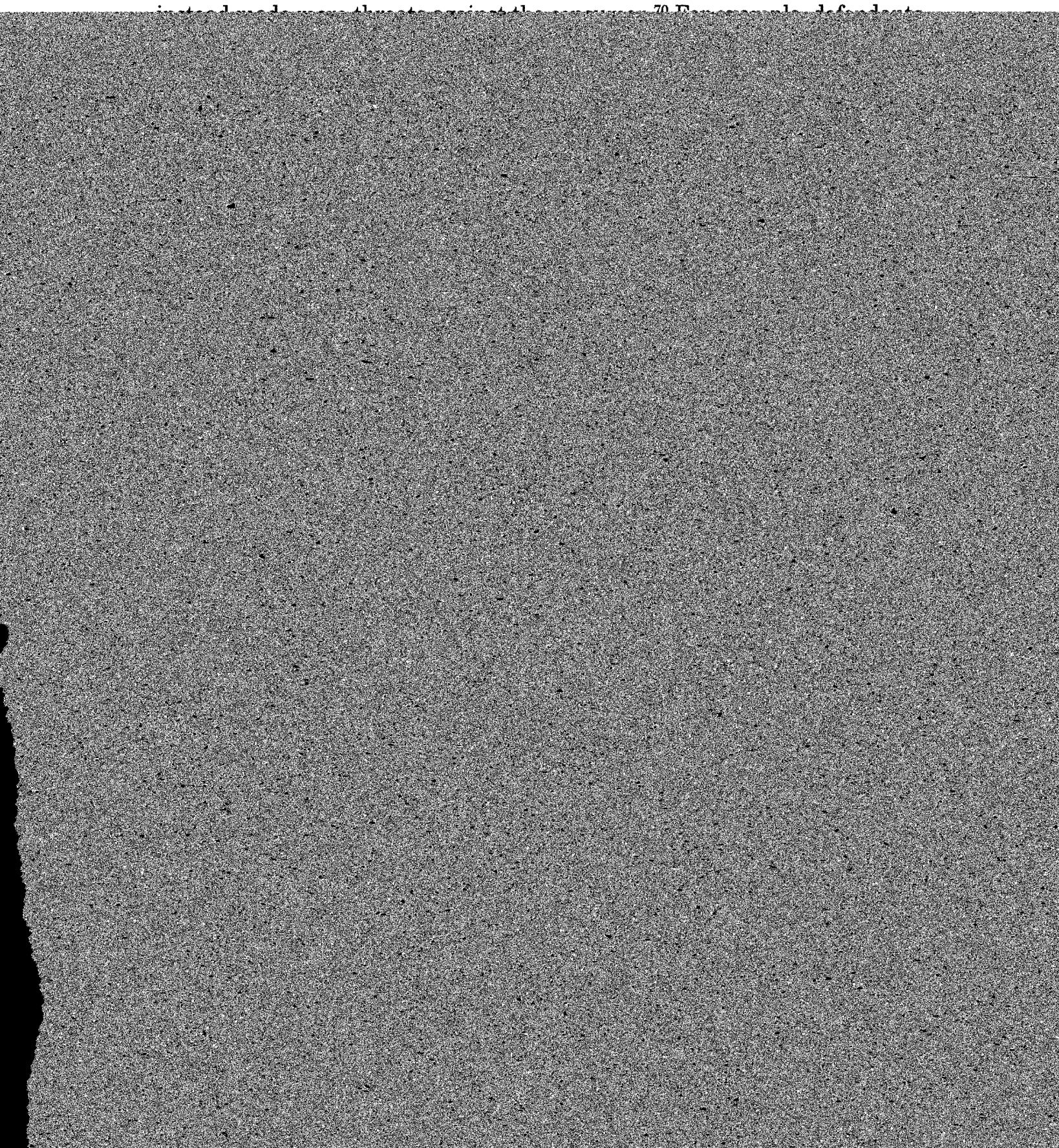
company in early 2016, they continued using the American Credit Adjusters



2016.²⁴ Intrinsic Solutions maintained a corporate bank account through
which it obtained \$1.16 million in consumer funds between March and



Investments.⁵² In addition, he has been a primary contact for



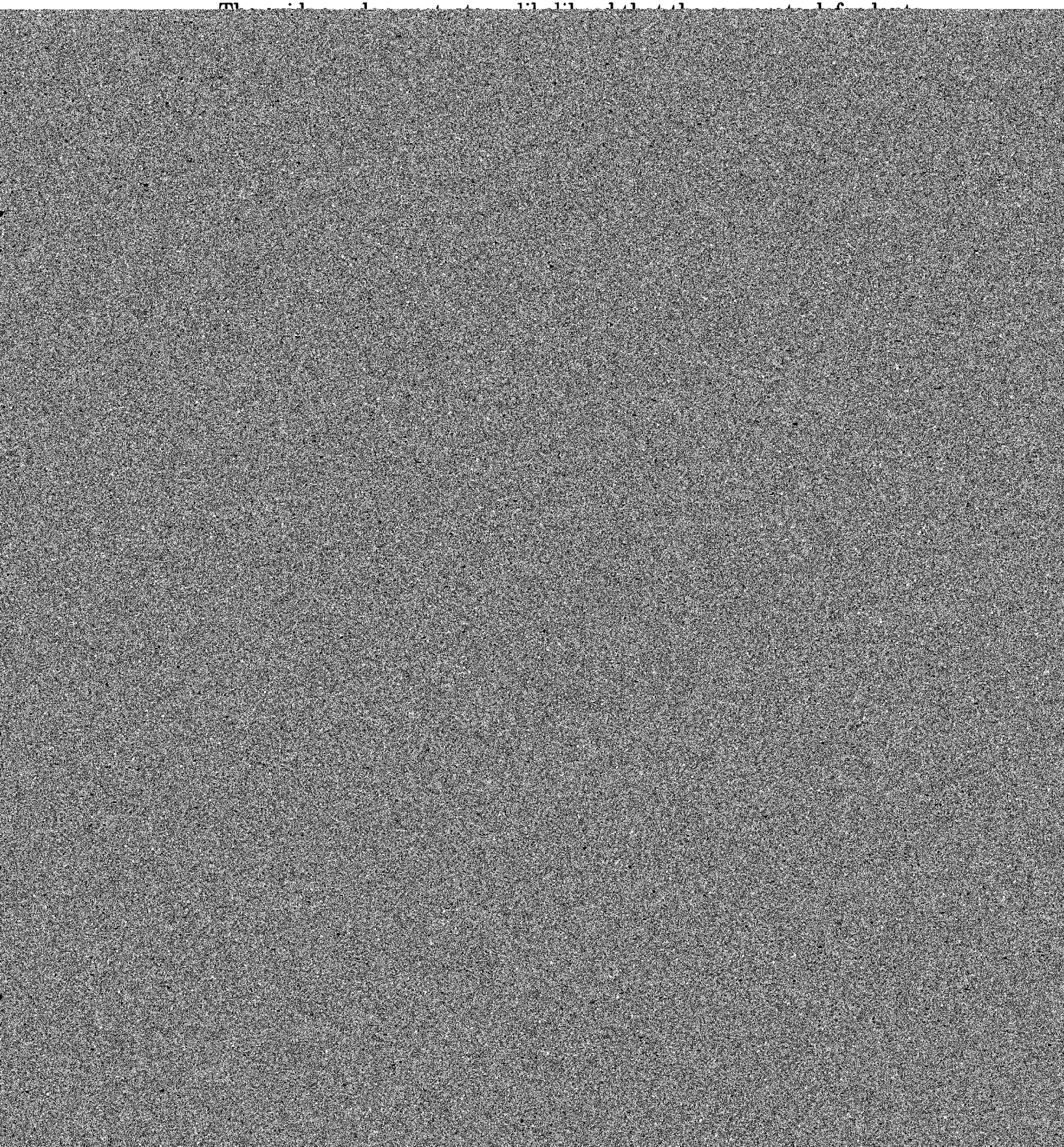
consumers would be served with legal papers or subject to a garnishment order.⁷⁷

~~Defendants' contacts with third parties blatantly violate Section 805(b)~~



Merch. Corp., 87 F.3d 466, 468 (11th Cir. 1996). Section 13(b) also empowers

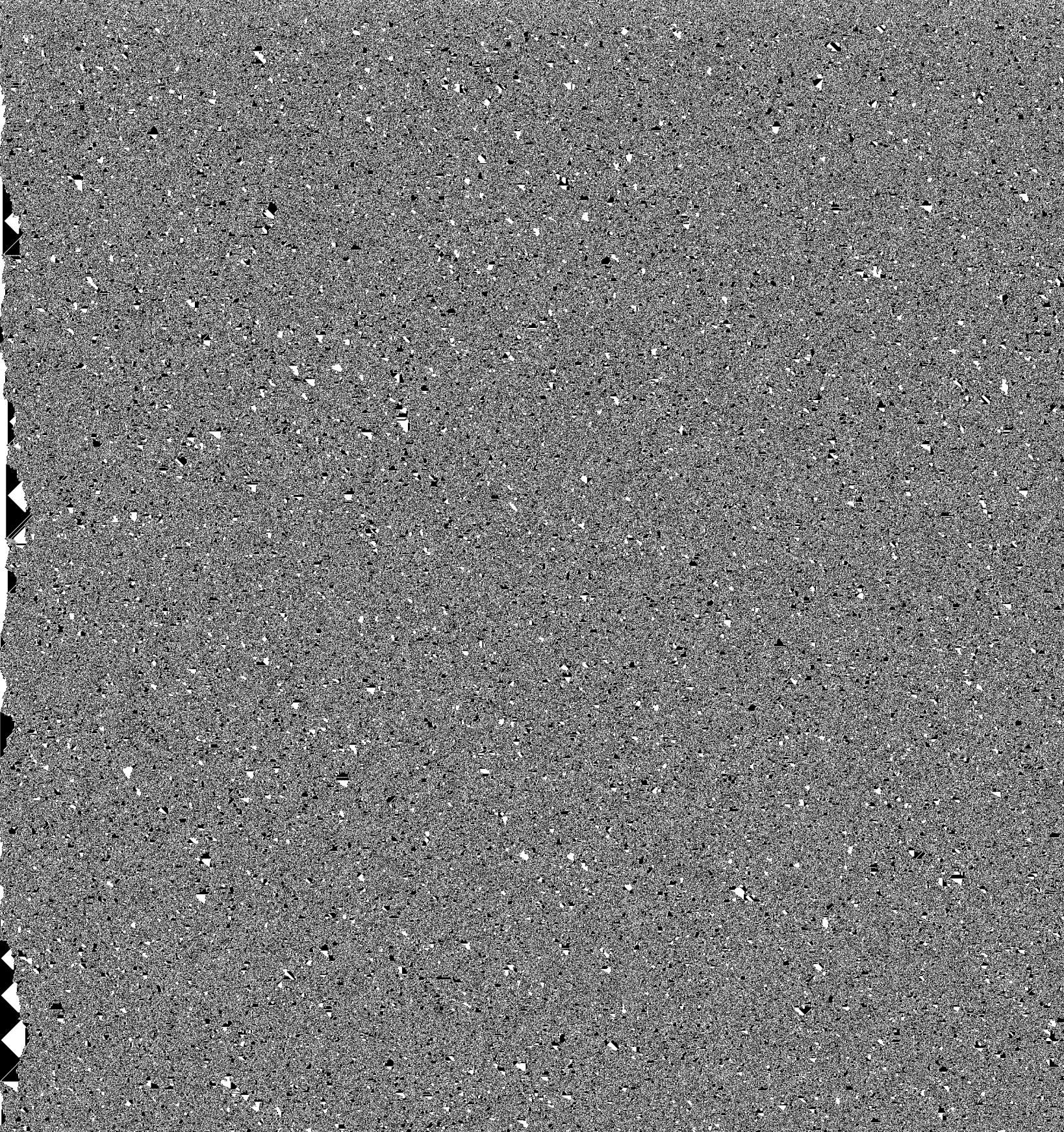
interest.” *FTC v. IAB Mktg. Assocs., LP*, 746 F. 3d 1228, 1232 (11th Cir. 2014)



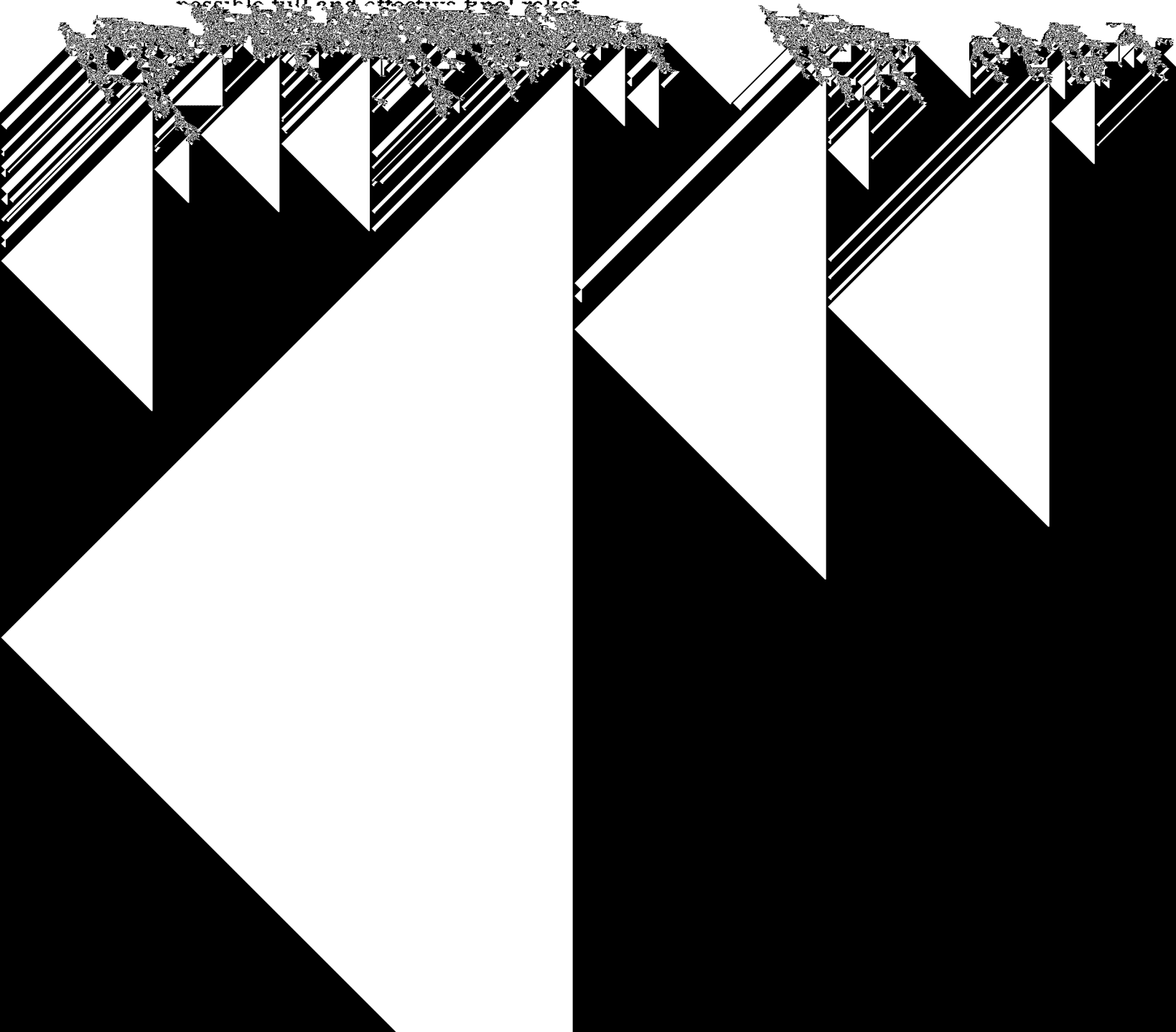
weight.” *FTC v. USA Beverages, Inc.*, No. 05-61682-civ-Lenard/Klein, 2005

WI 5654910 at *5 (S.D. Fla. Dec. 5, 2005) (en banc) (citing *FTC v. World*

that they will likely continue to deceive the public.⁹⁴ *FTC v. Five-Star Auto*



records.¹⁰³ Defendants' conduct and the nature of defendants' illegal scheme provide ample evidence that it is likely that defendants would conceal or dissipate assets absent *ex parte* relief. Thus, this case fits squarely into the narrow category of situations where *ex parte* relief is appropriate to make possible full and effective final relief.



RULE 1(D) CERTIFICATION

