

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

GLOBAL ACCESS TECHNICAL SUPPORT LLC,
also d/b/a Global S Connect, Yubdata Tech, and
Technolive, a Missouri limited liability company,
et al.,

Defendants.

Case No. 4:16-cv-01556-HEA

Judge Henry E. Autrey

**AGREED MOTION FOR ENTRY OF STIPULATED ORDERS FOR
PERMANENT INJUNCTION AND FINAL JUDGMENT**

Plaintiff Federal Trade Commission (“Commission” or “FTC”) and Defendants Rajiv Chhatwal, Global Access Technical Support LLC, Source Pundit LLC, Helios Digital Media LLC, DigiCare Desk LLC, Harinder Singh, and Rupinder Kaur (collectively, “Stipulating Defendants”) move this Court to enter their [Proposed] Stipulated Orders for Permanent Injunction and Final Judgment.

1. Plaintiff has agreed to two settlements that, if approved by the Court, would fully resolve this matter as to all parties that have appeared in the matter.

2. Plaintiff and Stipulating Defendants Rajiv Chhatwal, Global Access Technical Support LLC, Source Pundit LLC, Helios Digital Media LLC, and DigiCare Desk LLC have agreed to the terms of a [Proposed] Stipulated Order for Permanent Injunction and Final Judgment as to Defendants Rajiv Chhatwal, Global Access Technical Support LLC, Source Pundit LLC, Helios Digital Media LLC, and DigiCare Desk LLC, a copy of which is attached to

this motion as Exhibit A. Among other relief, the Proposed Order imposes a partially suspended judgment of \$5,150,506.00.

3. Separately, Plaintiff and Defendants Harinder Singh and Rupinder Kaur have agreed to the terms of a [Proposed] Stipulated Order for Permanent Injunction and Final Judgment as to Defendants Rupinder Kaur and Harinder Singh, a copy of which is attached to this motion as Exhibit B. Among other relief, the Proposed Order imposes a partially suspended judgment of \$800,375.00.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter the attached [Proposed] Stipulated Orders for Permanent Injunction and Final Judgment.

Respectfully submitted,

DAVID C. SHONKA
Acting General Counsel

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Global Access Technical Support LLC,
Source Pundit LLC, Helios Digital Media
LLC, DigiCare Desk LLC, and Rajiv
Chhatwal

CERTIFICATE OF SERVICE

I, Elizabeth C. Scott, hereby certify that on June 1, 2017, I electronically filed, AGREED MOTION FOR ENTRY OF STIPULATED ORDERS FOR PERMANENT INJUNCTION AND FINAL JUDGMENT with the Court using the CM/ECF system, which will automatically send copies to any attorney of record in the case.

Respectfully Submitted,

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