



1 business. The Corporate Defendants must have in place a new compensation plan in  
2 order to successfully re-start their full business operations. The FTC objects to the  
3 revised compensation plan, and it continues to object to the plan despite efforts by the  
4 Corporate Defendants to address the FTC's objections.

5 The Corporate Defendants further respectfully propose that the accelerated  
6 hearing be scheduled for October 21, 2015 at 10:30 a.m., which is the same time the  
7 Court will hear an unrelated matter in this case.<sup>1</sup> This Motion for an accelerated hearing  
8 is not opposed by the Federal Trade Commission ("FTC"), and the FTC has confirmed  
9 its availability for an accelerated hearing on October 21, 2015.

10 For these reasons, and for the reasons to be set forth in the Revised Compensation  
11 Plan Motion, the Corporate Defendants respectfully request that the Court schedule an  
12 accelerated hearing on the Revised Compensation Plan Motion for October 21, 2015 at  
13 10:30 a.m., or on such other date as soon as the Court's calendar and availability of  
14 counsel for the parties permits.

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22 <sup>1</sup> The hearing currently set at this time is scheduled for 45 minutes and it concerns  
23 the former temporary receiver's application for compensation (the "**Fee Hearing**"). If the  
24 Court's calendar will not permit expanding the scope and length of the Fee Hearing to  
25 include an accelerated hearing on the Compensation Motion, then the Corporate  
26 Defendants respectfully request that the Court keep the date and time for the Fee Hearing  
and schedule an accelerated hearing for the Compensation Motion as soon as the Court's  
calendar and availability of counsel for the parties permits.

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RESPECTFULLY SUBMITTED this 15th day of October, 2015.

QUARLES & BRADY LLP  
Renaissance One  
Two North Central Avenue  
Phoenix, AZ 85004-2391

By /s/ Edward A. Salanga  
Brian R. Booker  
John A. Harris  
Kevin D. Quigley  
Edward A. Salanga

*Attorneys for Defendants Vemma Nutrition  
Company, Vemma International Holdings, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2015, I electronically transmitted the attached document to the Clerk’s Office using the CM/ECF System for filing and a copy was electronically submitted to counsel at the e-mail addresses below:

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/s/ Angelina Chavez

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

Federal Trade Commission,  
  
Plaintiff,  
  
vs.  
  
Vemma Nutrition Company, *et al.*,  
  
Defendants.

NO. CV-15-01578-PHX-JJT

**[PROPOSED] ORDER GRANTING  
UNOPPOSED MOTION FOR  
ACCELERATED HEARING ON  
MOTION TO APPROVE  
COMPENSATION PLAN**

Based on Defendants Vemma Nutrition Company and Vemma International Holdings, Inc.'s (the "Corporate Defendants") Unopposed Motion For An Accelerated Hearing On Motion To Approve Revised Compensation Plan, the entire record before the Court, and good causing appearing therefore,

**IT IS HEREBY ORDERED:**

- (1) The Corporate Defendants shall file their Motion to Approve Revised Compensation Plan by close of business on October 16, 2015;
- (2) Plaintiff shall file any memorandum in support of its objections to the Revised Compensation Plan by close of business on October \_\_\_, 2015; and

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(3) An accelerated hearing on the Revised Compensation Plan Motion is scheduled for \_\_\_\_\_, 2015 at \_\_\_\_\_.m.

