

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NRRM, LLC, a limited liability company, also  
dba CARSHIELD,

AMERICAN AUTO SHIELD, LLC, a limited  
liability company,

Defendants.

Case No. 4:24-cv-1055

**PLAINTIFF'S UNOPPOSED MOTION TO ENTER STIPULATED ORDER FOR  
PERMANENT INJUNCTION, MONETARY JUDGMENT, AND OTHER RELIEF**

Plaintiff Federal Trade Commission respectfully moves the Court to enter the attached proposed Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief, which has been signed by counsel for both Plaintiff and Defendants. The Stipulated Order resolves all matters in dispute between Plaintiff and Defendants in this action.

Before filing this motion, Plaintiff's counsel conferred with Defendants' counsel, who advised that Defendants do not oppose the relief requested in this motion. Accordingly, Plaintiff respectfully moves the Court to enter the Stipulated Order.

Dated: July 31, 2024

Respectfully Submitted,

/s/ Matthew M. Scheff  
Matthew M. Scheff 0082229(OH)  
Adrienne M. Jenkins 0089568(OH)  
Sammi D. Nachtigal 0400774(MN)  
Attorneys for Plaintiff  
Federal Trade Commission

1111 Superior Avenue, Suite 200  
Cleveland, OH 44114  
Telephone: (216) 263-3455  
Email: [mscheff@ftc.gov](mailto:mscheff@ftc.gov)  
[ajenkins@ftc.gov](mailto:ajenkins@ftc.gov)  
[snachtigal@ftc.gov](mailto:snachtigal@ftc.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2024, I electronically filed *Plaintiff's Unopposed Motion to Enter Stipulated Order for Permanent Injunction, Monetary Judgment, and Other Relief* with the Court using the CM/ECF system. Additionally, because counsel for Defendants have not yet filed an appearance, I further certify that I have served this motion on them as follows:

Allen Denson (via email to [allen.denson@morganlewis.com](mailto:allen.denson@morganlewis.com))

Daniel Savrin (via email to [daniel.savrin@morganlewis.com](mailto:daniel.savrin@morganlewis.com))

/s/ Matthew M. Scheff  
Matthew M. Scheff  
Attorney for Plaintiff  
Federal Trade Commission