

BRIAN M. BOYNTON, Principal Deputy Assistant Attorney General
GUSTAV W. EYLER, Director
LISA K. HSIAO, Assistant Director
RACHAEL L. DOUD, Trial Attorney (NYRN 5117049)
ZACHARY L. COWAN, Trial Attorney (NC Bar 53432)
U.S. Department of Justice
Consumer Protection Branch
450 5th Street NW
Washington, DC 20002
Telephone: (202) 451-7468
rachael.doud@usdoj.gov
zachary.l.cowan@usdoj.gov

STEPHANIE M. HINDS (CABN 154284)
United States Attorney
MICHELLE LO (NYRN 4325163)
Chief, Civil Division
SHARANYA MOHAN (NYRN 5027768)
Assistant United States Attorney
Northern District of California
450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7198
sharanya.mohan@usdoj.gov

Attorneys for Plaintiff United States of America
[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KURBO, INC., a corporation,

and

WW INTERNATIONAL, INC., a
corporation,

Defendants.

Case No.: 22-CV-946

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED ORDER**

Plaintiff the United States of America and Defendants Kurbo, Inc. and WW International, Inc. (collectively, the “Parties”) have resolved all issues in this matter by the Proposed Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief, attached as Exhibit A, memorialized by the signatures at pages 15 through 17 (“Proposed Order”). In light of this agreed-upon resolution of this action, the Parties respectfully request that the court enter the Proposed Order.

Dated: February 16, 2022

Respectfully submitted,

FOR DEFENDANTS:

/s/ M. Sean Royall
M. SEAN ROYALL
Sidley Austin LLP
2021 McKinney Avenue
Dallas, Texas 75201
(214) 981-3330
sroyall@sidley.com

OLIVIA ADENDORFF
Kirkland & Ellis LLP
1601 Elm Street
Dallas, TX 75201
(214) 972-1758
olivia.adendorff@kirkland.com

FOR THE UNITED STATES OF AMERICA:

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

GUSTAV W. EYLER
Director
Consumer Protection Branch

LISA K. HSIAO
Assistant Director
/s/ Rachael L. Doud
RACHAEL L. DOUD
ZACHARY L. COWAN
Trial Attorneys
Consumer Protection Branch
U.S. Department of Justice
450 5th Street NW
Washington, DC 20002
Telephone: (202) 451-7468
rachael.doud@usdoj.gov
zachary.l.cowan@usdoj.gov

STEPHANIE M. HINDS
United States Attorney

/s/ Sharanya Mohan
SHARANYA MOHAN¹
Assistant United States Attorney
Northern District of California
450 Golden Gate Avenue
San Francisco, CA 94102
Telephone: (415) 436-7198
sharanya.mohan@usdoj.gov

OF COUNSEL:

KRISTIN COHEN
Acting Associate Director
Division of Privacy and Identity Protection

MARK EICHORN
Assistant Director

DANIELLE ESTRADA
DAVID WALKO
Attorneys
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Mailstop CC-10539
Washington, D.C. 20850
Tel: 202-326-2630 (Estrada)
Tel: 202-326-2880 (Walko)
destrada@ftc.gov
dwalko@ftc.gov

¹ I, Sharanya Mohan, hereby attest that all signatories have concurred in the filing of this document.