

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

FACEBOOK, INC.,  
a corporation,

Defendant.

Case No. 1:19-cv-02184-TJK

**DEFENDANT’S MOTION TO ENFORCE THE STIPULATED ORDER AND TO  
ENJOIN THE ADMINISTRATIVE REOPENING PROCEEDING OF THE FEDERAL  
TRADE COMMISSION**

Pursuant to the inherent authority of this Court as codified under the All Writs Act, 28 U.S.C. § 1651, and Rule 65(a) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying memorandum of points and authorities, Defendant Meta Platforms, Inc. (“Meta”)—previously, Facebook, Inc.—by and through its counsel, hereby moves this Court for an order enjoining the Federal Trade Commission’s administrative proceeding to reopen and modify Attachment A to the Stipulated Order for Civil Penalty, Monetary Judgment, and Injunctive Relief entered by this Court on April 23, 2020 (Dkt. 35), and enforcing the exclusive jurisdiction of this Court with respect to the modification and enforcement of that Order.

Meta seeks this injunctive relief on both a preliminary and permanent basis, and respectfully requests oral argument on its motion pursuant to Local Civil Rule 7(f). Meta met and conferred telephonically with counsel for Plaintiff on May 30, 2023, and Plaintiff has indicated that it will oppose the motion.

DATED: May 31, 2023

Respectfully submitted,

*/s/ James P. Rouhandeh*

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