

[NAMES AND ADDRESSES OF COUNSEL
APPEAR ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

KOCHAVA INC., corporation,

and

COLLECTIVE DATA SOLUTIONS, LLC, a
limited liability company,

Defendants.

Case No. 2:22-cv-00377-BLW

**JOINT MOTION FOR ENTRY OF
STIPULATED ORDER FOR
INJUNCTION AND OTHER
RELIEF**

The Federal Trade Commission (“FTC”) and Defendants Kochava, Inc. and Collective Data Solutions, LLC (collectively, “Defendants”) have resolved all issues in this matter through the proposed Stipulated Order for Injunction and Other Relief, attached as Exhibit A (“Stipulated Proposed Order”), signed by the Commission and the Settling Defendants. The Commission and Settling Defendants submit that good cause exists for the Court to enter the Stipulated Proposed Order. Specifically, the Stipulated Proposed Order will provide just relief on the allegations in

the Complaint, including appropriate injunctive relief pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b).

The Settling Defendants neither admit nor deny the allegations in the Complaint, except as specifically stated in the Stipulated Proposed Order. The Commission and Settling Defendants both support the entry of the Stipulated Proposed Order. In light of this agreed-upon resolution of this action, the Commission and Settling Defendants respectfully request that the Court enter the Stipulated Proposed Order.

Dated: May 4, 2026

Respectfully submitted,

FEDERAL TRADE COMMISSION

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