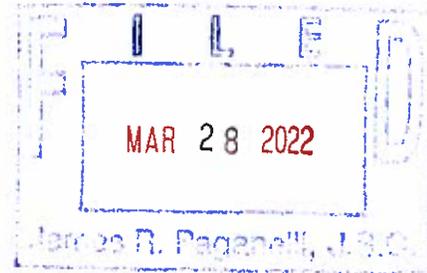


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Attorney for Plaintiffs



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Deputy Attorney General
Assistant Section Chief
Consumer Fraud Prosecution Section
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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION, ESSEX COUNTY
DOCKET NO. ESX-C-244-19

MATTHEW J. PLATKIN, Acting Attorney
General of the State of New Jersey, and SEAN P.
NEAFSEY, Acting Director of the New Jersey
Division of Consumer Affairs¹,

Plaintiffs,

v.

22MODS4ALL INC., JANE AND JOHN DOES
1-20, individually and as owners, officers,
directors, shareholders, founders, members,
managers, agents, servants, employees,
representatives and/or independent contractors of
22MODS4ALL INC. and XYZ
CORPORATIONS 1-20,

Defendants.

Civil Action

CONSENT ORDER
ENTERING THE SUMMARY
JUDGMENT AND ATTORNEYS'
FEES ORDERS IN FAVOR OF
PLAINTIFFS AS FINAL
JUDGMENTS AND ORDERS

WHEREAS, on December 19, 2019, plaintiffs, the Attorney General of the State of New Jersey, and the Acting Director of the New Jersey Division of Consumer Affairs (collectively, "Plaintiffs") filed a Verified Complaint and Order to Show Cause against defendant 22Mods4All

¹ In accordance with R. 4:34-4, the caption has been revised to reflect the current Acting Attorney General and Acting Director of the Division of Consumer Affairs.

Inc. ("Defendant") alleging, among other things, violations of the New Jersey Consumer Fraud Act, N.J.S.A. 56:8-1 to -227 ("CFA"), based on Defendant's sale in or into New Jersey of large capacity ammunition magazines ("LCMs") exceeding the capacity permitted by N.J.S.A. 2C:39-1(y);

WHEREAS, on April 2, 2021, Plaintiffs moved for an Order Granting Summary Judgment against Defendant on the grounds that Defendant's 18 undisputed sales of LCMs exceeding the capacity permitted by N.J.S.A. 2C:39-1(y) constituted multiple violations of the CFA thereby entitling Plaintiffs to an award of civil monetary penalties, attorneys' fees, and costs pursuant to N.J.S.A. 56:8-13, N.J.S.A. 56:8-11, and N.J.S.A. 56:8-19;

WHEREAS, on May 24, 2021, the Court, having considered Plaintiffs' moving papers and Defendants' papers in opposition and for good cause shown, ordered, among other things, that:

- (1) Plaintiffs' motion for summary judgment be granted, except as to a November 24, 2018 sale;
- (2) Defendant's advertisement and offer for sale of prohibited LCMs to New Jersey consumers constitutes multiple instances of unlawful practices in violation of N.J.S.A. 56:8-2 of the CFA and N.J.A.C. 13:45A-4.1 of the Rule Concerning Hazardous Products;
- (3) Defendant's sale of prohibited LCMs to New Jersey shipping addresses constitutes multiple instances of unlawful practices in violation of N.J.S.A. 56:8-2 of the CFA;
- (4) Defendant be permanently enjoined from advertising, and/or offering for sale LCMs to New Jersey consumers, as prohibited by N.J.S.A. 56:8-2 of the CFA;
- (5) Defendant be permanently enjoined from selling LCMs to consumers in New Jersey, as prohibited by N.J.S.A. 56:8-2 of the CFA;
- (6) Defendant shall pay to the Division of Consumer Affairs civil penalties in the total amount of \$150,000, in accordance with N.J.S.A. 56:8-13; and
- (7) Plaintiffs be granted leave to submit a fee application for all attorneys' fees and

costs incurred in connection with the prosecution of this action, as authorized by the CFA, N.J.S.A. 56:8-11 and N.J.S.A. 56:8-19;

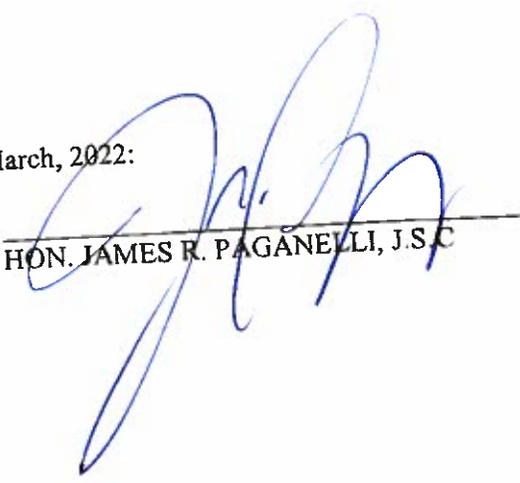
WHEREAS, on June 7, 2021, Plaintiffs filed an Application for Fees;

WHEREAS, on September 1, 2021, the Court, having considered Plaintiffs' moving papers and Defendants' papers in opposition and for good cause shown, ordered, among other things that: (1) Plaintiffs' Application for Fees be granted; and (2) Defendant shall pay to the Division of Consumer Affairs attorneys' fees in the total amount of \$26,996;

IT IS HEREBY STIPULATED AND AGREED, by the Parties' respective undersigned counsel, as follows:

- a) Plaintiffs will not pursue an evidentiary hearing and hereby withdraw their claims as to the November 24, 2018 sale by Defendants;
- b) The May 24, 2021 Order Granting Summary Judgment against Defendant and the September 1, 2021 Order Granting Plaintiffs' Fee Application are final judgments and orders; and
- c) The matter is now concluded.

IT IS SO ORDERED on this 28 day of March, 2022:


HON. JAMES R. PAGANELLI, J.S.C

**THE PARTIES CONSENT TO THE FORM, CONTENT AND ENTRY OF THIS
CONSENT ORDER**

FOR THE PLAINTIFFS:

**MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL OF NEW JERSEY**

By: s/ Jesse J. Sierant

Dated: March 28, 2022

Jesse J. Sierant
Deputy Attorney General
Assistant Section Chief
Consumer Fraud Prosecution Section

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FOR THE DEFENDANT:

SCOTT L. BRAUM ASSOCIATES, LTD.

By:  _____

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Date: 3/25, 2022

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