

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.,

Defendants.

Case. No.: 1:23-cv-06188-ER

**PROPOSED ORDER TO SHOW CAUSE
FOR MOTION FOR TEMPORARY
RESTRAINING ORDER**

Upon the Declaration of Anjelica Sarmiento in Support of the Proposed Order to Show Cause For Motion For Temporary Restraining Order (“Motion For Temporary Restraining Order”) and Exhibits, Memorandum of Law in Support of Motion For Temporary Restraining Order, Declaration of Scott Syms in Support of Motion For Temporary Restraining Order, and Plaintiff Federal Trade Commission’s Complaint for Temporary Restraining Order and Preliminary Injunction Pursuant to Section 13(b) of the Federal Trade Commission Act in the above-captioned matter, it is hereby ORDERED that the above-named Defendants show cause before this Court, at Room _____, in the Daniel Patrick Moynihan, United States Courthouse New York, 500 Pearl Street, Manhattan, New York, NY 10007, on July 20, 2023, at _____ a.m./p.m., or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining Defendant IQVIA Holdings Inc. and Defendant Propel Media, Inc. (together with IQVIA Holdings Inc., “Defendants”) from consummating the proposed acquisition after 11:59 p.m. on July 21, 2023.

Notice of this motion has been given to Defendants' attorneys by Plaintiff's counsel, and a reasonable effort has been made to reach agreement. Defendants currently oppose the Motion for Temporary Restraining Order. Plaintiff and Defendants are continuing to meet and confer to see if the parties can reach an agreement regarding a stipulation related to a temporary restraining order. If after meeting and conferring, the parties can reach an agreement, Plaintiff will update the Court accordingly.

A proposed temporary restraining order is attached.

IT IS SO ORDERED.

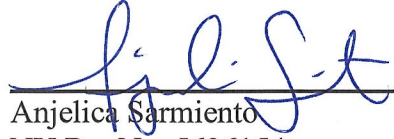
Dated: July __, 2023

New York, New York

United States District Judge

Dated: July 17, 2023

Respectfully submitted,



Anjelica Sarmiento
NY Bar No. 5636154
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
Tel: 202-725-3429
Email: asarmiento@ftc.gov

Jennifer Fleury (NY Bar No. 5053178) (*pro hac*)
Jordan Andrew (MD Bar) (*pro hac*)
Stephanie Bovee (VA Bar No. 46678) (*pro hac*)
Habin Chung (DC Bar. No. 1048514) (*pro hac*)
Samuel Fulliton (TN Bar. No. 036802) (*pro hac*)
Cory Gordon (MD Bar) (*pro hac*)
Wade Lippard (DC Bar. No. 1616824) (*pro hac*)
Stephen Mohr (DC Bar. No. 982570) (*pro hac*)
Jessica Moy (CA Bar. No. 272941) (*pro hac*)
Christina Perez (TX Bar. No. 788183) (*pro hac*)
Michelle Seo (NY Bar. No. 5007091) (*pro hac*)
Varnitha Siva (NY Bar. No. 5337670) (*pro hac*)
William Sohn (DC Bar. No. 1017274) (*pro hac*)
Jay Tymkovich (DC Bar. No. 241366) (*pro hac*)
Lily Verbeck (DC Bar. No. 90006809) (*pro hac*)

Counsel for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 17, 2023, I electronically filed a true and correct copy of the foregoing document using the United States District Court for the Southern District of New York CM/ECF System.


I FURTHER CERTIFY that I served the foregoing document on the following counsel via electronic mail:

Kenneth S. Reinker
CLEARY GOTTLIEB STEEN & HAMILTON LLP
2112 Pennsylvania Avenue Northwest
Washington, DC 20037
Tel.: (202) 974-1500
Email: kreinker@cgsh.com

Counsel for Defendant IQVIA Holdings Inc.

Alexander Okuliar
MORRISON FOERSTER
2100 L Street NW STE 900
Washington, DC 20037
Tel.: (202) 887-1500
Email: aokuliar@mofo.com

Counsel for Defendant Propel Media, Inc.


ANJELICA SARMIENTO
Bar No. 5636154
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580
Tel: 202-725-3429
Email: asarmiento@ftc.gov

*Counsel for Plaintiff
Federal Trade Commission*