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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 SOUTHERN CALIFORNIA
16 INSTITUTE OF LAW, a California
17 corporation,

18 Plaintiff,

19 vs.

20 TCS EDUCATION SYSTEM, an
21 Illinois corporation; DAVID J.
22 FIGULI, an individual; and GLOBAL
23 EQUITIES, LTD. d/b/a HIGHER
24 EDUCATION GROUP, a Colorado
25 limited liability company,

26 Defendants.
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CASE NO.: CV10-8026 PSG (AJWx)

[Assigned to Hon. Philip S. Gutierrez]

**DECLARATION OF GEORGE A.
SHOHET IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE TIME
FOR PLAINTIFF TO FILE ITS FIRST
AMENDED COMPLAINT**

Action Filed: Oct. 25, 2010

Current Filing Date: April 26, 2011

Proposed Filing Date: May 17, 2011

Courtroom: 880

[Proposed Order lodged concurrently
herewith and Stipulation filed
concurrently herewith]

1 I, George A. Shohet, declare:

2 1. I am an attorney licensed to practice in the courts of California and a
3 member of the Bar of this Court. I make this declaration in support of the parties'
4 request for an extension of time to file plaintiff's First Amended Complaint, which
5 is presently due to be filed on April 26, 2011. I have personal knowledge of the
6 facts set forth herein and, if called as a witness, could and would competently
7 testify about them.

8 2. On April 21, 2011, Tom W. Armour, Esq., a Colorado attorney,
9 contacted me on behalf of defendants David J. Figuli and Global Equities, LLC.
10 ("Global"). Mr. Armour explained that Mr. Figuli and Global were seeking local
11 representation. In addition, Mr. Armour explained that Mr. Figuli and Global
12 wanted to discuss the claims against them in this case before plaintiff filed a First
13 Amended Complaint. I told Mr. Armour that the plaintiff was agreeable to doing
14 so as long as an extension was acceptable to TCS Education System ("TCS") and
15 the Court was willing to permit an extension of time. I then spoke with Jeff
16 Whittington, Esq., counsel for TCS, who, on April 22, 2011, advised me that he
17 had approval from his client. The parties agreed to a three week extension of time
18 to, and including, May 17, 2011.

19 3. The request for an extension of time is being made for good cause and
20 not to delay the proceedings. Accordingly, the parties respectfully request that the
21 Court grant the requested extension of time to file plaintiff's First Amended
22 Complaint.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct. Executed this 22 day of April at
25 Los Angeles, California

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27 George A. Shohet
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who have consented to electronic service are being served with a copy of the foregoing document via Central District of California CM/ECF system on April 22, 2011

/s/ George A. Shohet