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 10 EDUCATION SYSTEM

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 SOUTHERN CALIFORNIA
 14 INSTITUTE OF LAW, a
 15 California corporation,
 16 Plaintiff,

17 vs.

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

Case No. CV10-8026 JAK (AJWx)
 (Assigned to the Hon. John A.
 Kronstadt)

**STIPULATION EXTENDING
 THE TIME FOR DEFENDANTS
 TO FILE RESPONSIVE
 PLEADINGS TO THE FIRST
 AMENDED COMPLAINT;
 [PROPOSED] ORDER**

Complaint Filed: October 25, 2010
 Current Filing Date: June 6, 2011
 Proposed Filing Date: June 27, 2011
 Discovery Cut-Off: tbd
 Trial Date: tbd

26 WHEREAS, on April 5, 2011, the Court granted in part and denied in
 27 part defendant TCS Education System's Motion to Dismiss the Complaint filed
 28 by plaintiff Southern California Institute of Law;

WHEREAS, the Court granted the plaintiff until April 26, 2011 to file its
 First Amended Complaint;

**STIPULATION EXTENDING THE TIME FOR DEFENDANTS TO FILE RESPONSIVE
 PLEADINGS TO THE FIRST AMENDED COMPLAINT**

1 WHEREAS, the parties stipulated to extend the time for plaintiff to file
2 its First Amended Complaint, from April 26, 2011, to May 17, 2011;

3 WHEREAS, plaintiff filed its First Amended Complaint on May 17,
4 2011;

5 WHEREAS, the Court struck plaintiff's First Amended Complaint on
6 May 18, 2011, and ordered plaintiff to re-file its First Amended Complaint no
7 later than May 23, 2011;

8 WHEREAS, plaintiff re-filed its First Amended Complaint on May 23,
9 2011;

10 WHEREAS, defendants David J. Figuli ("Figuli") and Global Equities,
11 LLC ("Global") have requested time to retain local counsel;

12 WHEREAS, defendants are attempting to engage in further discussions
13 of the case with plaintiff's counsel to encourage a resolution;

14 WHEREAS, all parties are agreeable to extending the time for the filing
15 of defendants' responsive pleadings to the First Amended Complaint;

16 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
17 subject to the approval of the Court, by and between counsel for the
18 undersigned parties, and defendants Figuli and Global, that the time for
19 defendants to file their responsive pleadings to the First Amended Complaint is
20 hereby extended from June 6, 2011, to and including, June 27, 2011.

21
22 IT IS SO STIPULATED:

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**STIPULATION EXTENDING THE TIME FOR DEFENDANTS TO FILE RESPONSIVE
PLEADINGS TO THE FIRST AMENDED COMPLAINT**

1 DATED: June 6, 2011

KAUFMAN BORGHEEST & RYAN
LLP

2
3 By: 

NICHOLAS W. SARRIS, ESQ.
JEFFREY S. WHITTINGTON, ESQ.
Attorneys for Defendant TCS
EDUCATION SYSTEM

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8 DAVID J. FIGULI
GLOBAL EQUITIES, LLC
8697 S. Blue Creek Road
Evergreen, CO 80439
Tel.: (720) 810-2495
Email: dfiguli@figulilawgroup.com

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12
13 DATED: June 6, 2011

14 By: 

DAVID J. FIGULI, ESQ. for himself
and GLOBAL EQUITIES, LLC.
In Pro Per

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17 LAW OFFICES OF GEORGE A.
18 SHOHET
245 Main Street, Suite 310
Venice, CA 90291-5216
20 Tel.: (310) 452-3176
21 Fax: (310) 452-2270
22 Email: georghshohet@gmail.com

23 DATED: June 6, 2011

LAW OFFICES OF GEORGE A.
SHOHET

24
25
26 By: 

27 GEORGE A. SHOHET, ESQ.
Attorneys for Plaintiff SOUTHERN
28 CALIFORNIA INSTITUTE OF LAW

**STIPULATION EXTENDING THE TIME FOR DEFENDANTS TO FILE RESPONSIVE
PLEADINGS TO THE FIRST AMENDED COMPLAINT**

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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 June __, 2011

/s/ Nicholas W. Sarris

STIPULATION EXTENDING THE TIME FOR DEFENDANTS TO FILE RESPONSIVE PLEADINGS TO THE FIRST AMENDED COMPLAINT