

1 George A. Shohet SBN 112697  
 2 **LAW OFFICES OF GEORGE A. SHOHE**,  
 3 **A PROFESSIONAL CORPORATION**  
 4 245 Main Street, Suite 310  
 5 Venice, CA 90291-5216  
 6 Tel.: (310) 452-3176  
 7 Fax: (310) 452-2270

8 [Additional Counsel Appear on Signature Page]

9 Attorneys for Plaintiff  
 10 Southern California Institute of Law

11 **UNITED STATES DISTRICT COURT**  
 12 **CENTRAL DISTRICT OF CALIFORNIA**

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

16 Plaintiff,

17 vs.

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

24 Defendants.

CASE NO.: CV10-8026 JAK (AJWx)

[Assigned to Hon. John A. Kronstadt]

**STIPULATION ALLOWING  
 PLAINTIFF TO FILE A SINGLE,  
 OVERSIZED MEMORANDUM IN  
 OPPOSITION TO DEFENDANTS'  
 MOTIONS TO DISMISS**

Action Filed: Oct. 25, 2010

Hearing Date: August 8, 2011

Courtroom: 750

[Proposed Order lodged concurrently  
 herewith]

1 WHEREAS, on June 27, 2011, defendant TCS Education System ("TCS")  
2 filed its Motion to Dismiss the First Amended Complaint ("FAC") filed by plaintiff  
3 Southern California Institute of Law;

4 WHEREAS, on June 27, 2011, defendants David J. Figuli and Global  
5 Equities, LLC d/b/a Higher Education Group filed a Motion to Dismiss the FAC;

6 WHEREAS, defendants' motions to dismiss raise similar arguments and  
7 plaintiff believes that it would be more efficient to file a single, oversized  
8 memorandum in opposition rather than two memoranda;

9 WHEREAS, plaintiff proposes filing a single memorandum which does not  
10 exceed 35 pages in length;

11 WHEREAS, if plaintiff were to file two separate memoranda, Local Rule  
12 11-6 would permit plaintiff to use as much as 50 pages;

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,  
14 subject to the approval of the Court, by and between counsel for the undersigned  
15 parties, that the plaintiff may file and serve a single memorandum in opposition to  
16 defendants' motions to dismiss which does not exceed 35 pages in length.

17 **IT IS SO STIPULATED:**

18 Jeffrey Stewart Whittington, Esq.  
19 Nicholas W. Sarris, Esq.  
20 **KAUFMAN BORGEEST AND RYAN**  
21 **LLP**  
22 23975 Park Sorrento  
23 Suite 370  
24 Calabasas, CA 91302  
25 818-880-0992  
26 Fax: 818-880-0993

26 DATED: July 14, 2011

27 By \_\_\_\_\_ /s/  
28 Nicholas W. Sarris, Esq.  
Attorneys for Defendant  
TCS Education System

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Maurice Fitzgerald, Esq.  
Cody Jaffe, Esq.  
**STRAZULO FITZGERALD LLP**  
3991 MacArthur Blvd. Suite 400  
Newport Beach, CA 92660  
Tel.: 949-333-0883  
Fax: 949-748-6146

DATED: July 14, 2011

By: \_\_\_\_\_ /s/  
Cody Jaffe, Esq.  
Attorneys for Defendants David J. Figuli and  
Global Equities, LLC d/b/a Higher Education  
Group

**LAW OFFICES OF GEORGE A. SHOJET**

Gretchen M. Nelson SBN 112566  
**KREINDLER & KREINDLER LLP**  
707 Wilshire Blvd, Suite 4100  
Los Angeles, CA 90017  
Tel.: (213) 622-6469  
Fax: (213) 622-6019



DATED: July 14, 2011

By \_\_\_\_\_  
George A. Shojet  
Attorneys for Plaintiff  
Southern California Institute of Law

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 July 14, 2011

        /s/ George A. Shohet