

1 Jeffrey S. Whittington, Esq./SBN 236028
Email: jwhittington@kbrlaw.com
2 Nicholas W. Sarris, Esq./SBN 242011
Email: nsarris@kbrlaw.com
3 Vanessa K. Manolatos, Esq./SBN 266541
Email: vmanolatos@kbrlaw.com
4 KAUFMAN BERGEEST & RYAN LLP
23975 Park Sorrento, Suite 370
5 Calabasas, CA 91302
Telephone: (818) 880-0992
6 Facsimile: (818) 880-0993

7 Attorneys for Defendant TCS
8 EDUCATION SYSTEM

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

12 SOUTHERN CALIFORNIA)
13 INSTITUTE OF LAW, a California)
14 corporation,)

15 Plaintiff,

16 vs.

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

22 Defendants.

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

JOINT STATUS REPORT

Complaint Filed: October 25, 2010
Discovery Cut-Off: November 30,
2011

Trial Date: March 27, 2012

23 **TO THE HONORABLE JOHN A. KRONSTADT:**

24 **I. THE PARTIES**

26 Plaintiff is a for-profit California corporation that operates a law school
27 with campuses in Santa Barbara and Ventura Counties. Defendant TCS is a
28 not-for-profit corporation that affiliates with specialized schools and colleges,

1 providing financial support and other resources. Defendant David J. Figuli
2 (“Figuli”) is a Colorado-based attorney who specializes in the education
3 industry. Defendant Global Equities, LLC, which does business as Higher
4 Education Group (“HEG”), provides consulting to post-secondary education
5 institutions.

6 **II. CASE STATUS AND SETTLEMENT**

7 On October 3, 2011, the parties appeared for a hearing with respect to
8 the Motions to Dismiss filed on behalf of each of the defendants. Such
9 Motions to Dismiss were granted in part, and denied in part. At the hearing,
10 the Court directed the parties to return to court on November 28, 2011, to
11 advise as to the status of settlement efforts between the parties. The Court
12 further instructed that, if the matter had been settled, no appearance on
13 November 28, 2011, would be required.

14 Following the October 3, 2011, hearing on the Motions to Dismiss,
15 plaintiff filed a Second Amended Complaint on October 18, 2011.
16 Additionally, and following the taking of several depositions, the parties
17 participated in private mediation with Philip Meldman, Esq, on November 10,
18 2011. During mediation, the case settled with respect to all parties.

19 Inasmuch as the matter has settled, the parties respectfully request that
20 the November 28, 2011, status conference be taken off calendar. Within
21 approximately two weeks, the parties anticipate filing a stipulation of dismissal
22 with prejudice as to the entire action and lodging a proposed order thereon.
23

24 Respectfully submitted,

25 DATED: November 18, 2011

KAUFMAN BORGEEST & RYAN LLP

26
27 By: /s/ Jeffrey S. Whittington
JEFFREY S. WHITTINGTON, ESQ.
28 NICHOLAS W. SARRIS, ESQ.

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VANESSA K. MANOLATOU, ESQ.
Attorneys for Defendant
TCS EDUCATION SYSTEM
LAW OFFICES OF GEORGE SHOHET

DATED: November 18, 2011

By: /s/ George A. Shohet
GEORGE A. SHOHET, ESQ.
Attorneys for Plaintiff
SOUTHERN CALIFORNIA INSTITUTE
OF LAW

DATED: November 18, 2011 LAW OFFICES OF KREINDLER &
KREINDLER LLP

By: /s/ Gretchen M. Nelson
GRETCHEN M. NELSON, ESQ.
JACOB MENSCH, ESQ.
Attorneys for Plaintiff
SOUTHERN CALIFORNIA INSTITUTE
OF LAW

DATED: November 18, 2011 LAW OFFICES OF STRAZULO
FITZGERALD LLP

By: /s/ Maurice J. Fitzgerald
MAURICE J. FITZGERALD, ESQ.
CODY JAFFE, ESQ.
Attorneys for Defendants
DAVID J. FIGULI and GLOBAL
EQUITIES, LLC d/b/a HIGHER
EDUCATION GROUP

PROOF OF SERVICE
UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CASE NAME: Southern California Institute of Law v. TCS Education System, et al.
CASE NO.: CV10-8026 PSG

I declare as follows:

I am employed in the County of Los Angeles, California. I am over the age of 18 years, and not a party to the within action; my business address is 23975 Park Sorrento, Suite 370, Calabasas, California 91302. I am readily familiar with my employer's business practice for collection and processing of correspondence for mailing with the United States Postal Service. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

On November 18, 2011, I served a true and correct copy, with all exhibits, of the following document(s) described as follows:

JOINT STATUS REPORT

on the interested parties in the within action by placing the above documents in the United States mail for Express Mail delivery at 23975 Park Sorrento, Suite 370, Calabasas, California 91302 in a sealed envelope, with Express Mail postage thereon fully prepaid; by depositing copies of the above documents in a box or other facility regularly maintained by Federal Express, with delivery fees paid by the sender's account. (Code of Civil Procedure § 1013(c).) (*Overnight Delivery Service*)

via CM/ECF (*eService*)

on the interested parties in the within action by faxing a true and correct copy of the above documents to the facsimile number listed below. (*Fax Service*)

on the party or parties named below, by following ordinary business practice, placing a true copy thereof enclosed in a sealed envelope, for collection and mailing with a United States Postal Service, where it would be deposited for first class delivery, postage fully prepaid, in the United States Postal Service, that same day in the ordinary course of business, addressed as set forth below. (*Regular Office Deposit*)

SEE ATTACHED SERVICE LIST

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on November 18, 2011, at Calabasas, California.

By: /s/ Rina Howard
Signature of Declarant

By: Rina Howard
Name of Declarant

SERVICE LIST

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GEORGE A. SHOJET (SBN 112697)
LAW OFFICES OF GEORGE A. SHOJET, PC
245 Main Street, Suite 310
Venice, CA 90291-5216
Tel.: (310) 452-3176
Fax: (310) 452-2270
Attorneys for Plaintiff SOUTHERN CALIFORNIA INSTITUTE OF LAW

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
Attorneys for Plaintiff SOUTHERN CALIFORNIA INSTITUTE OF LAW

MAURICE J. FITZGERALD
CODY JAFFE
STRAZULO FITZGERALD
3 Embarcadero Center, 8th Floor
San Francisco, CA 94111
Tel.: (415) 394-9500
Fax: (415) 689-1206
Attorneys for Defendants DAVID J. FIGULI and GLOBAL EQUITIES, LLC, DBA HIGHER
EDUCATION GROUP