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6 | Attorneys for Defendant KIRIT PATEL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

V.

BROADWAY GLOBAL MASTER INC.,
a corporation, also d/b/a BGM,

IN-ARABIA SOLUTIONS INC., a corporation, and

KIRIT PATEL, individually and as an officer of BROADWAY GLOBAL MASTER INC., and IN-ARABIA SOLUTIONS INC.

Defendants.

Case No. 2:12-cv-0855 JAM DAD

**STIPULATION TO EXTEND STAY;
AND ORDER**

STIPULATION

On August 23, 2012, defendant Kirit Patel was indicted by the United States on criminal charges related to the same subject matter as the instant case (see Case No. 2:12-CR-00306-JAM). On September 12, 2012, the Court entered a stipulation between Mr. Patel and counsel for the Federal Trade Commission (“FTC”) staying this matter for six months or until the resolution of the criminal case, whichever is shorter. The parties continued the stay for an additional four months on March 8, 2013, an additional 90 days on July 8, 2013, an additional 90 days on November 8, 2013, an additional 90 days on February 7, 2014, an additional 90 days on April 29, 2014 and an additional 120 days on

1 August 5, 2014.

2 In October 2014, Mr. Patel has entered into a plea agreement in the criminal case. The
3 agreement includes restitution and criminal penalties. Sentencing is scheduled for February 10, 2015.
4 Given the pending issues with the criminal case, and in order to allow Mr. Patel and the FTC to try and
5 reach a resolution of the civil matter, Mr. Patel and counsel for the FTC believe it is necessary to
6 extend the stay for an additional 120 days. Mr. Patel agrees that, during the pendency of the stay, he
7 will not seek the release of assets frozen pursuant to the preliminary injunction.

8 The requested stay is a stay of the entire civil action against all defendants including a stay of
9 the pending motion for default judgment against defendants Broadway Global Master Inc. and In-
10 Arabia Solutions Inc. The stay does not alter the preliminary injunction with asset freeze, which will
11 remain in full effect.

12 IT IS SO STIPULATED.

13 Dated: December 8, 2014

14 FEDERAL TRADE COMMISSION

15 By /s/ Sarah Schroeder

16 Sarah Schroeder
17 Attorney for Plaintiff
FEDERAL TRADE COMMISSION

18 Dated: December 8, 2014

19 ELLIS LAW GROUP, LLP

20 By /s/Andrew M. Steinheimer

21 Andrew M. Steinheimer
22 Attorney for Defendant
KIRIT PATEL

23 IT IS SO ORDERED.

24 Dated: 12/8/2014

25 /s/ John A. Mendez

26 Honorable John A. Mendez
27 United States District Court Judge