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6 Attorneys for Defendant KIRIT PATEL, INDIVIDUALLY AND AS AN OFFICER OF
 BROADWAY GLOBAL MASTER, INC., AND IN-ARABIA SOLUTIONS, INC.

8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

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

16 IN-ARABIA SOLUTIONS INC., a corporation,
 and

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

19 Defendants.

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

**STIPULATION TO EXTEND STAY; AND
 ORDER**

21 **STIPULATION**

22 On August 23, 2012, defendant Kirit Patel was indicted by the United States on criminal
 23 charges related to the same subject matter as the instant case (see Case No. 2:12-CR-00306-JAM). On
 24 September 12, 2012, the Court entered a stipulation between Mr. Patel and counsel for the Federal
 25 Trade Commission (“FTC”) staying this matter for six months or until the resolution of the criminal
 26 case, whichever is shorter. The parties continued the stay for an additional four months on March 8,
 27 2013, an additional 90 days on July 8, 2013, an additional 90 days on November 8, 2013, an additional
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1 90 days on February 7, 2014, an additional 90 days on April 29, 2014, an additional 120 days on
2 August 5, 2014 and an additional 120 days on December 8, 2014.

3 In October 2014, Mr. Patel entered into a plea agreement in the criminal case. The agreement
4 includes restitution and criminal penalties. Sentencing was originally scheduled for February 10, 2015.
5 However, sentencing has now been continued to May 19, 2015. Given the pending issues with the
6 criminal case, and in order to allow Mr. Patel and the FTC to try and reach a resolution of the civil
7 matter, Mr. Patel and counsel for the FTC believe it is necessary to extend the stay for an additional 90
8 days. Mr. Patel agrees that, during the pendency of the stay, he will not seek the release of assets
9 frozen pursuant to the preliminary injunction.

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

14 IT IS SO STIPULATED.

15 Dated: April 9, 2015

FEDERAL TRADE COMMISSION

17 By /s/ Sarah Schroeder

Sarah Schroeder

Attorney for Plaintiff

FEDERAL TRADE COMMISSION

20 Dated: April 9, 2015

ELLIS LAW GROUP, LLP

22 By /s/ Andrew M. Steinheimer

Andrew M. Steinheimer

Attorney for Defendant

KIRIT PATEL

25 IT IS SO ORDERED.

26 Dated: April 9, 2015

/s/ John A. Mendez

Honorable John A. Mendez

United States District Court Judge