

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION
CASE NO. 16-CV-62603-WPD

GRISEL ALONSO, as Receiver
for Elm Tree Investment Advisors,
LLC, Elm Tree Investment Fund,
LLC, et al,

Plaintiffs,

v.

JAMES BENVENUTO, NGU
INVESTORS, LLC, JEAN
BENVENUTO, SURJIT WALIA,
S.W. EQUITIES CORP., TIMOTHY
HARTMANN, ALEXANDER
BUKHSHTABER, MVS MEDIA GROUP
LLC, HARRY TAWIL, EDUARDO DOS
SANTOS, FILOMENA CALABRIA, JOSE
ROFFE, MIREILLE ROFFE, SOMESWARI
NUKALA, YAEL TAPIERO, LAAS W.
TURNBULL, OMRI TINTPULVER,
CONSTANTINO DOS SANTOS, ARMAND
DELMAR, AHMAD NAQVI, MERCEDES
ELMALEH, ELIA BLUMIN, TED
GREENWALD, ALINK TALSKY, ELVIS
PERVAN, ANGELO ISMIRNIOGLOU,
JONATHAN VERK,

Defendants

**AGREED MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
AMENDED COMPLAINT**

Defendants Alexander Bukhshtaber and MVS Media Group, LLC, by their undersigned counsel, pursuant to Southern District Local Rule 7.1 and Rule 7 , Fed. R. Civ. P., respectfully move this Court for an enlargement of time to respond to the Plaintiff's Amended Complaint to and including January 24, 2017. As grounds for this Motion, Defendants state that they are engaged in discussions with counsel for Plaintiff to seek to resolve the claims made in this matter and seek

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to avoid incurring any unnecessary fees and costs during said discussions. Counsel for the Plaintiff Dan Newman, Esq., has agreed to this Motion and the requested enlargement of time and has authorized the undersigned to so represent to this Court.

Wherefore, Defendants Bukhshtaber and MVS Media Group pray that this Court grant this agreed motion. Attached hereto as required by Local Rule 7.1(a)(2) is a proposed Order granting this Motion.

Respectfully submitted,

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s/Sherryll Martens Dunaj
Sherryll Martens Dunaj
Florida Bar No. 136707
Sdunaj@Miami-law.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served this 11th day of January, 2017, upon Daniel Newman, Esq., dnewman@broadandcassel.com and Christopher Cavallo, Esq., ccavallo@broadandcassel.com, Broad and Cassel, 2 S. Biscayne Blvd., 21st Floor, Miami, FL 33131, and Elizabeth Beck, Esq., elizabeth@beckandlee.com; Deborah Chadsey, Esq., dchadsey@kavinokycook.com; Lorne Berkeley, Esq., lberkeley@drbdc-law.com, via electronic transmission.

s/ _____
Sherryll Martens Dunaj

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION
CASE NO. 16-CV-62603-WPD

GRISEL ALONSO, as Receiver
for Elm Tree Investment Advisors,
LLC, Elm Tree Investment Fund,
LLC, et al,

Plaintiffs,

v.

JAMES BENVENUTO, NGU
INVESTORS, LLC, JEAN
BENVENUTO, SURJIT WALIA,
S.W. EQUITIES CORP., TIMOTHY
HARTMANN, ALEXANDER
BUKHSHTABER, MVS MEDIA GROUP, et al,
Defendants

ORDER GRANTING AGREED MOTION FOR ENLARGEMENT OF TIME

Defendants Alexander Bukhshtaber and MVS Media Group, LLC's agreed Motion for Enlargement of time to January 24, 2017, to respond to Plaintiff's amended complaint is hereby granted and Defendants' response to the amended complaint shall be filed on or before January 24, 2017.

DONE and ORDERED in the Southern District of Florida at Ft. Lauderdale, Florida, this ____ day of January, 2017.

United States District Judge

copies to all counsel of record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 16-62603-CIV-DIMITROULEAS

GRISEL ALONSO, as Receiver for Elm
Tree Investment Advisors, LLC, Elm Tree
Investment Fund, LP, Elm Tree 'e'Conomy
Fund, LP, and Elm Tree Motion
Opportunity, LP,

Plaintiff,

v.

JAMES BENVENUTO, an individual, NGU
INVESTORS, LLC, a Florida limited liability
Company; JEAN BENVENUTO, an individual,
SURJIT WALIA, an individual, S.W. EQUITIES
CORP., a New York corporation, TIMOTHY
HARTMANN, an individual, ALEXANDER
BUKHSHTABER, an individual, MVS MEDIA
GROUP, LLC, a Florida limited liability company,
HARRY TAWIL, an individual, EDUARDO DOS
SANTOS, an individual, FILOMENA CALABRIA,
an individual, JOSE ROFFE, an individual,
MIREILLE ROFFE, an individual,
SOMESWARI NUKALA, an individual, YAEL
TAPIERO, an individual, LAAS W. TURNBULL,
an individual, OMRI TINTPULVER, an individual,
CONSTANTINO DOS SANTOS, an individual,
ARMAND DELMAR, an individual, AHMAD NAQVI,
an individual, MERCEDES ELMALEH, an individual,
ELIA BLUMIN, an individual, TED GREENWALD,
an individual, ALINA TALSKY, an individual,
ELVIS PERVAN, an individual, ANGELO
ISMIRNIOGLOU, an individual, and JONATHAN VERK,
an individual.

Defendants.


_____ /

ORDER GRANTING MOTION FOR EXTENSION OF TIME

THIS CAUSE is before the Court on the Agreed Motion for Enlargement of Time to Respond to Amended Complaint (the "Motion"). [DE 16]. The Court has carefully considered the Motion and is otherwise fully advised in the premises.

Accordingly, it is **ORDERED AND ADJUDGED** that the Motion is **GRANTED**. Defendants Alexander Bukhshtaber and MVS Media Group, LLC will respond to the Complaint on or before **January 24, 2017**.

DONE AND ORDERED in Chambers, Fort Lauderdale, Broward County, Florida, this 13th day of January, 2017.


WILLIAM P. DIMITROULEAS
United States District Judge

Copies furnished to:
Counsel of record