

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

GRIZEL 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

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**AGREED MOTION FOR FURTHER ENLARGEMENT OF TIME TO RESPOND TO  
AMENDED COMPLAINT UPON THE GROUND OF CONTINUED AND PENDING  
SETTLEMENT DISCUSSIONS**

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 a further and additional enlargement of time to respond to the Plaintiff's Amended Complaint to and including February 20, 2017. As grounds for this Motion, Defendants state that they continue to be engaged in settlement discussions with counsel for Plaintiff to seek

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to resolve the claims made in this matter and seek to avoid incurring any unnecessary fees and costs during said discussions. Counsel for the receiver Plaintiff, Dan Newman, Esq., has agreed to this requested additional enlargement of time.

Wherefore, Defendants Bukhshtaber and MVS Media Group pray that this Court grant this motion for an additional enlargement of time to February 20, 2017. 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 10<sup>th</sup> day of February, 2017, upon Daniel Newman, Esq., dnewman@broadandcassel.com and Christopher Cavallo, Esq., ccavallo@broadandcassel.com, Broad and Cassel, 2 S. Biscayne Blvd., 21<sup>st</sup> Floor, Miami, FL 33131, and Elizabeth Beck, Esq., elizabeth@beckandlee.com; Deborah Chadsey, Esq., dchadsey@kavinokycocook.com; Lorne Berkeley, Esq., lberkeley@drbdc-law.com, via electronic transmission.

s/ \_\_\_\_\_  
Sherryll Martens Dunaj

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**ORDER GRANTING AGREED MOTION FOR ADDITIONAL ENLARGEMENT OF TIME**

Defendants Alexander Bukhshtaber and MVS Media Group, LLC's Motion for an additional Enlargement of time to February 20, 2017, to respond to Plaintiff's amended complaint is hereby granted and Defendants' response to the amended complaint shall be filed on or before February 20, 2017.

DONE and ORDERED in the Southern District of Florida at Ft. Lauderdale, Florida, this \_\_\_\_ day of February, 2017.

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United States District Judge

copies to all counsel of record