

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

**MOTION FOR ADDITIONAL ENLARGEMENT OF TIME TO RESPOND TO
AMENDED COMPLAINT 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 an additional enlargement of time to respond to the Plaintiff's Amended Complaint to and including February 10, 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

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matter and seek to avoid incurring any unnecessary fees and costs during said discussions. The undersigned attempted to reach counsel for the Plaintiff, Dan Newman, Esq. (and his assistant) but was unable to speak with him by telephone, following which the undersigned sent an email to both attorney Newman and his assistant, to which no response has as yet been received. The undersigned's email communication asked for attorney Newman's agreement to this motion, and it is believed that counsel will not object to this requested additional enlargement of time pending settlement discussions.

Wherefore, Defendants Bukhshtaber and MVS Media Group pray that this Court grant this motion for an additional enlargement of time to February 10, 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
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been served this 24th day of January, 2017, upon Daniel Newman, Esq., dneuman@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@kavinokycok.com; Lorne Berkeley, Esq., lberkeley@drbdc-law.com, via electronic transmission.

s/ _____
Sherryll Martens Dunaj

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Defendants

ORDER GRANTING MOTION FOR ADDITIONAL ENLARGEMENT OF TIME

Defendants Alexander Bukhshtaber and MVS Media Group, LLC's Motion for an additional Enlargement of time to February 10, 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 10, 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