

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

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,

Case No. 16-62603-CIV-DIMITROULEAS
Proceeding Ancillary to
No. 15-CV-60082-Dimitrouleas/Snow

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.

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE
RESPONSE TO MOTION TO SET ASIDE FINAL DEFAULT JUDGMENT**

COMES NOW, Plaintiff, GRISEL ALONSO, solely in her capacity as the Receiver for

Elm Tree Investment Advisors, LLC (“ETIA”), Elm Tree Investment Fund, LP (“ETIF”), Elm Tree 'e'conomy Fund, LP (“ETEF”), Elm Tree Motion Opportunity, LP (“ETMO”), and Etopia, LP (“Etopia”), and respectfully submits this motion for enlargement of time to file her response to Defendant Elia Blumin’s Motion to Set Aside Final Default Judgment [D.E. 211].

1. On May 26, 2017, the Court entered its Final Default Judgment against Defendant Elia Blumin. [D.E. 117].

2. On December 21, 2018, Defendant Elia Blumin filed his Motion to Set Aside Final Default Judgment (the “Motion”). [D.E. 211].

3. As such, the Receiver’s response to the Motion is due by January 4, 2019.

4. The Receiver respectfully requests a fourteen (14) day enlargement of time to respond to the Motion. The proposed extension is requested because of the intervening holidays and corresponding preplanned vacations, undersigned counsel’s obligations on other matters scheduled, and to give the Receiver and Mr. Blumin an opportunity to discuss a potential resolution of this matter without the need for further Court intervention.

5. The requested enlargement of time is being requested in good faith and not for purposes of delay.

6. Mr. Blumin will not be prejudiced by the requested extension.

7. Mr. Blumin does not oppose the enlargement of time.

CONCLUSION

For the foregoing reasons, the Receiver respectfully requests a 14-day enlargement of time, until January 18, 2019, to file her response to the Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 27, 2018, a true and correct copy of the foregoing was served via electronic transmission or U.S. Mail on all counsel or parties of record.

Respectfully submitted,

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