

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.

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**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY IN  
FURTHER SUPPORT OF MOTION TO SET ASIDE FINAL DEFAULT JUDGMENT**

COMES NOW, Defendant, ELIA BLUMIN, by and through undersigned counsel,



respectfully submits this unopposed motion for enlargement of time to file his Reply in Further Support of the Motion to Set Aside Final Default Judgment [D.E. 214].

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. On December 27, 2018, the Receiver filed an unopposed motion for enlargement of time to file a response to the Motion. [D.E. 214.]

4. On December 31, 2018, Magistrate Judge Snow granted the Receiver an enlargement of time, until January 18, 2019, to respond to the Motion.

5. On January 17, 2019 the Receiver filed a second unopposed motion for enlargement of time to file a response to the Motion. [D.E. 216.]

6. On January 18, 2019, Magistrate Judge Snow granted the Receiver an enlargement of time, until January 25, 2019, to respond to the Motion [D.E. 217].

7. On January 25, 2019, the Receiver filed her response to the Motion [D.E. 218].

8. The Defendant respectfully requests a ten (10) day enlargement of time, until February 11, 2019, to reply to the Receiver’s Motion. The proposed extension is requested to give the Receiver and Mr. Blumin additional time to discuss a potential resolution of this matter without the need for further Court intervention.

9. The extension is being requested in good faith and not for purposes of delay.

10. The Receiver does not oppose the requested extension.

11. The Receiver will not be prejudiced by the requested extension.

**CONCLUSION**

For the foregoing reasons, the Defendant, Elia Blumin, respectfully requests a 10-day extension of time, until February 11, 2019, to file his Reply in Further Support of the Motion to Set Aside Final Default Judgment.

Respectfully submitted,

By: /s/ Joshua Truppman, Esq.  
Joshua Truppman, Esq.  
Florida Bar No.: 111795  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **January 31, 2019**, the foregoing was filed using the Court's CM/ECF system and served via transmission of Notices of Electronic Filing generated by CM/ECF to all counsel by the Court's CM/ECF system.

By: /s/ Joshua Truppman, Esq.  
Joshua Truppman, Esq.