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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

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MAY - 3 2005
CENTRAL DISTRICT OF CALIFORNIA
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12 2005 APR 29 PM 3:36

13 FEDERAL TRADE COMMISSION,)
14 Plaintiff,)
15 v.)
16 Del Sol LLC, also d/b/a Del)
Sol Educational,)
17 and)
18 Fernando Lopez Gonzalez,)
19)
20 Defendants.)
21

05
Case No. CV-05-3013 GAF (RCx)

12 FAXED

STIPULATION AND [PROPOSED] ORDER:
(1) EXTENDING TRO WITH ASSET
FREEZE AND OTHER INJUNCTIVE
RELIEF, (2) CONTINUING HEARING ON
PRELIMINARY INJUNCTION, AND (3)
CONTINUING CERTAIN DEADLINES SET
FORTH IN THE TRO

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1 Counsel for Plaintiff Federal Trade Commission ("Plaintiff"
2 or "FTC") and counsel for Defendants Del Sol LLC, also d/b/a Del
3 Sol Educational and Fernando Lopez Gonzalez (collectively,
4 "Defendants") hereby state as follows:

5 1. On April 25, 2005, the Honorable Judge Gary Allen Feess
6 entered a "Temporary Restraining Order with an Asset Freeze, an
7 Accounting, Limited Expedited Discovery, Immediate Access and
8 Other Equitable Relief, and Order for Defendants to Show Cause Why
9 a Preliminary Injunction Should Not Issue" ("TRO").

10 2. The TRO was personally served on each of the Defendants
11 on April 27, 2005.

12 3. Under the terms of the TRO, the Defendants are to serve
13 and file their Opposition to the issuance of a preliminary
14 injunction no later than May 2, 2005. Plaintiff is to serve and
15 file its Response, including any supplementary evidence and no
16 later than May 4, 2005.

17 4. A hearing on the issuance of a preliminary injunction is
18 presently set for May 5, 2005 at 9:30 a.m. and the TRO shall
19 expire on May 5, 2005 at 11:59 p.m.

20 5. Defendants have now requested additional time in which
21 to prepare a Response to the Order to show cause as to why a
22 preliminary injunction should not be issued, to comply with
23 certain deadlines set forth in the TRO, and to continue the
24 depositions of defendant Fernando Lopez Gonzalez and Fernando
25 Tapia Gonzalez.

26 Through their counsel, all parties have agreed to stipulate
27 to continue the preliminary injunction hearing, modify the
28 briefing schedule for the preliminary injunction hearing, extend

1 certain deadlines set forth in the TRO, and continue the
2 depositions of defendant Fernando Lopez Gonzalez and Fernando
3 Tapia Gonzalez.

4 Plaintiff and the Defendants, by and through their counsel,
5 hereby stipulate as follows:

6 1. The parties agree that the hearing on the issuance of a
7 preliminary injunction shall take place on **May 19, 2005 at 9:30**
8 **a.m.** or at the Court's first available subsequent date.

9 2. Defendants shall serve and file any Opposition no later
10 than **May 13, 2005 4:00 p.m.**

11 3. Plaintiff shall serve and file any Response including
12 any supplemental evidence no later than **May 17, 2005 4:00 p.m.**

13 4. Service of Defendant's Opposition and Plaintiff's
14 Response shall be made by personal or overnight delivery,
15 facsimile, or e-mail (Adobe Acrobat .pdf files only).

16 5. Defendants shall provide to counsel for the FTC the
17 financial statements, verified statements, and accountings
18 required pursuant to Section IV (Financial Statements and
19 Accounting) and Section V (Repatriation of Foreign Assets) of the
20 TRO by **May 6, 2005 4:00 p.m.**

21 6. The deposition of Defendant Fernando Lopez Gonzalez is
22 continued to **May 10, 2005 at 9:00 a.m.** The deposition of Fernando
23 Tapia Gonzalez is continued to **May 10, 2005 at 1:00 p.m.**

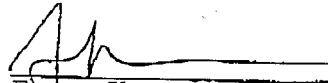
24 7. The TRO shall otherwise continue in full force and
25 effect, including but not limited to the injunctive provisions,
26 the asset freeze, and the access to books and records, until such

27 ///
28 ///


1 time that the judge issues a ruling on the issuance of a
2 preliminary injunction against the Defendants.

3
4 SO STIPULATED:

5 April 29, 2005.


Faye Chen Barnouw
Attorney for Plaintiff
Federal Trade Commission

8 April 29, 2005


Eduardo Brito
Attorney for Defendants
Del Sol LLC and
Fernando Lopez Gonzalez

14 IT IS SO ORDERED:

15
16 Dated: 5/2, 2005

GARY ALLEN FEESS

The Honorable Gary Allen Feess
United States District Judge

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