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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY _____ *jm* DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MOHIT A. KHANNA and MAK 1
ENTERPRISES GROUP, LLC,

Defendants,

and

FIRST OPPORTUNITIES MANAGEMENT
GROUP, INC., and SHARANJIT K.
KHANNA aka SHARANJIT K. GREWAL,

Relief Defendants.

Case No. 09cv1784 BEN (CAB)

**STIPULATION FOR ENTRY OF AND
PRELIMINARY INJUNCTION AND
ORDERS: (1) FREEZING ASSETS; (2)
APPOINTING A PERMANENT
RECEIVER; (3) PROHIBITING THE
DESTRUCTION OF DOCUMENTS; (4)
GRANTING EXPEDITED
DISCOVERY; (5) REQUIRING
ACCOUNTINGS; AND (6)
REPATRIATING FUNDS**

STIPULATION

1
2 Plaintiff Securities and Exchange Commission (“Commission”), Defendant Mohit A.
3 Khanna (“Khanna”), and Relief Defendant Sharanjit K. Khanna (“S. Khanna”), by and through
4 their respective counsel of record, agree and stipulate as follows:

5 A. This Court has jurisdiction over the parties to, and the subject matter of, this
6 action.

7 B. The Commission filed an *Ex Parte* Application For A Temporary Restraining
8 Order and Orders: (1) Freezing Assets; (2) Appointing A Permanent Receiver; (3) Prohibiting
9 The Destruction Of Documents; (4) Granting Expedited Discovery; (5) Requiring Accountings;
10 (6) Repatriating Funds; And (7) Requiring Mohit Khanna to Surrender Passport; And To Show
11 Cause Re Preliminary Injunction And Appointment Of A Permanent Receiver (the
12 “Application”).

13 C. On August 18, 2009, the Court granted the Temporary Restraining Order and
14 Orders: (1) Freezing Assets; (2) Appointing A Permanent Receiver; (3) Prohibiting The
15 Destruction Of Documents; (4) Granting Expedited Discovery; (5) Requiring Accountings; (6)
16 Repatriating Funds; And (7) Requiring Mohit Khanna to Surrender Passport; And To Show
17 Cause Re Preliminary Injunction And Appointment Of A Permanent Receiver.

18 D. The Court set a hearing on the Show Cause Re Preliminary Injunction and
19 Appointment of a Permanent Receiver for August 31, 2009 at 4:00 p.m. in Courtroom 3.

20 E. Khanna, individually, and as an officer and director of Defendant MAK 1
21 Enterprises Group, LLC (“MAK 1”) and its subsidiaries and affiliates, does not oppose the entry
22 of Preliminary Injunction and Orders (1) Freezing Assets; (2) Appointing A Permanent Receiver;
23 (3) Prohibiting The Destruction Of Documents; (4) Granting Expedited Discovery; (5) Requiring
24 Accountings; and (6) Repatriating Funds.

25 F. S. Khanna does not oppose the entry of Preliminary Injunction and Orders (1)
26 Freezing Assets; (2) Appointing A Permanent Receiver; (3) Prohibiting The Destruction Of
27 Documents; (4) Granting Expedited Discovery; (5) Requiring Accountings; and (6) Repatriating
28

1 Funds.

2 G. Without, admitting or denying the allegations in the Commission's Complaint,
3 Khanna and S. Khanna consent to the following order:

4 **ORDER**

5 **I.**

6 IT IS HEREBY ORDERED that the Commission's Application for a Preliminary
7 Injunction and Orders: (1) Freezing Assets; (2) Appointing A Permanent Receiver; (3)
8 Prohibiting The Destruction Of Documents; (4) Granting Expedited Discovery; (5) Requiring
9 Accountings; (6) Repatriating Funds; And (7) Requiring Khanna to Surrender Passport; And To
10 Show Cause Re Preliminary Injunction And Appointment Of A Permanent Receiver is
11 GRANTED and finds that this Court has jurisdiction over the parties to, and the subject matter
12 of, this action.

13 **II.**

14 IT IS FURTHER ORDERED that Defendants Khanna and MAK 1 and their officers,
15 agents, servants, employees, attorneys, subsidiaries and affiliates, and those persons in active
16 concert or participation with any of them who receive actual notice of this Order, by personal
17 service or otherwise, and each of them, be and hereby are preliminarily restrained and enjoined
18 from, directly or indirectly, in the absence of any applicable exemption:

19 A. Unless a registration statement is in effect as to a security, making use of any
20 means or instruments of transportation or communication in interstate commerce
21 or of the mails to sell such security through the use or medium of any prospectus
22 or otherwise;

23 B. Unless a registration statement is in effect as to a security, carrying or causing to
24 be carried through the mails or in interstate commerce, by any means or
25 instruments of transportation, any such security for the purpose of sale or for
26 delivery after sale; or

1 C. Making use of any means or instruments of transportation or communication in
2 interstate commerce or of the mails to offer to sell or offer to buy through the use
3 or medium of any prospectus or otherwise any security, unless a registration
4 statement has been filed with the Commission as to such security, or while the
5 registration statement is the subject of a refusal order or stop order or (prior to the
6 effective date of the registration statement) any public proceeding or examination
7 under Section 8 of the Securities Act of 1933 ("Securities Act"), 15 U.S.C. § 77h;
8 in violation of Section 5 of the Securities Act, 15 U.S.C. § 77e.

9 **III.**

10 IT IS FURTHER ORDERED that Defendants Khanna and MAK 1, and their officers,
11 agents, servants, employees, attorneys, subsidiaries and affiliates, and those persons in active
12 concert or participation with any of them, who receive actual notice of this Order, by personal
13 service or otherwise, and each of them, be and hereby are preliminarily restrained and enjoined
14 from, directly or indirectly, in the offer or sale of any securities, by the use of any means or
15 instruments of transportation or communication in interstate commerce or by the use of the
16 mails:

- 17 A. employing any device, scheme or artifice to defraud;
18 B. obtaining money or property by means of any untrue statement of a material fact
19 or any omission to state a material fact necessary in order to make the statements
20 made, in light of the circumstances under which they were made, not misleading;
21 or
22 C. engaging in any transaction, practice, or course of business which operates or
23 would operate as a fraud or deceit upon the purchaser;

24 in violation of Section 17(a) of the Securities Act, 15 U.S.C. § 77q(a).

25 **IV.**

26 IT IS FURTHER ORDERED that Defendants Khanna and MAK 1, and their officers,
27 agents, servants, employees, attorneys, subsidiaries and affiliates, and those persons in active
28

1 concert or participation with any of them, who receive actual notice of this Order, by personal
2 service or otherwise, and each of them, be and hereby are preliminarily restrained and enjoined
3 from, directly or indirectly, in connection with the purchase or sale of any security, by the use of
4 any means or instrumentality of interstate commerce, or of the mails, or of any facility of any
5 national securities exchange:

- 6 A. employing any device, scheme or artifice to defraud;
- 7 B. making any untrue statement of a material fact or omitting to state a material fact
8 necessary in order to make the statements made, in the light of the circumstances
9 under which they were made, not misleading; or
- 10 C. engaging in any act, practice, or course of business which operates or would
11 operate as a fraud or deceit upon any person;

12 in violation of Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”), 15
13 U.S.C. § 78j(b), and Rule 10b-5 thereunder, 17 C.F.R. § 240.10b-5.

14 V.

15 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, Defendants
16 Khanna and MAK 1, and their officers, agents, servants, employees, attorneys, subsidiaries and
17 affiliates, and those persons in active concert or participation with any of them, who receive
18 actual notice of this Order, by personal service or otherwise, and each of them, be and hereby are
19 preliminarily restrained and enjoined from, directly or indirectly:

- 20 A. transferring, assigning, selling, hypothecating, changing, wasting, dissipating,
21 converting, concealing, encumbering, or otherwise disposing of, in any manner,
22 any funds, assets, securities, claims, or other real or personal property, wherever
23 located, of Defendants Khanna and MAK 1, or their subsidiaries or affiliates,
24 owned by, controlled by, managed by or in the possession or custody of any of
25 them;

1 B. transferring, assigning, selling, hypothecating, encumbering, or otherwise
 2 disposing of any securities, including, but not limited to, any investment contracts
 3 or other securities of Defendant MAK 1, or any of its subsidiaries or affiliates.

4 VI.

5 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, an
 6 immediate freeze shall be placed on all monies and assets (with an allowance for necessary and
 7 reasonable living expenses to be granted only upon good cause shown by application to the
 8 Court with notice to and an opportunity for the Commission to be heard) in all accounts at any
 9 bank, financial institution or brokerage firm (including any futures commission merchant), all
 10 certificates of deposit, and other funds or assets, held in the name of, for the benefit of, or over
 11 which account authority is held by Khanna and MAK 1, or any entity affiliated with any of them,
 12 including, but not limited to, the accounts set forth below:

13

<u>Bank Name</u>	<u>Account Name</u>	<u>Account No. (last 4 digits)</u>
14 Union Bank of California	MAK 1 Enterprises Group, LLC	6132
15 Union Bank of California	MAK 1 Enterprises Group, LLC	6586
16 Union Bank of California	MAK 1 Enterprises Group, LLC	0011
17 Union Bank of California	MAK 1 Enterprises Group, LLC	0490
18 Union Bank of California	MAK 1 Enterprises Group, LLC	0496
19 Union Bank of California	2008 Khanna Family Trust	8634
20 Union Bank of California	2008 Khanna Family Trust	7893
21 Union Bank of California	MAK 1 Enterprises Group, LLC	0326
22 Union Bank of California	Mohit Khanna	0865
23 Union Bank of California	Mohit Khanna	0970
24 Union Bank of California	First Opportunities Management Group, 25 LLC	6655

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1	Union Bank of California	First Opportunities Management Group, LLC	6353
2			
3	Union Bank of California	2005 Khanna Family Trust	0865
4	Union Bank of California	2005 Khanna Family Trust	3384
5	Union Bank of California	2005 Khanna Family Trust	3376
6	Union Bank of California	2005 Khanna Family Trust	8009
7	Union Bank of California	2005 Khanna Family Trust	8568
8	Union Bank of California	Mohit Khanna	3328
9	Union Bank of California	Trustee for Mischa K. Khanna	0309
10	Union Bank of California	Sharanjit Khanna	0970
11	Wachovia	2005 Khanna Family Trust	7635
12	Wachovia	2005 Khanna Family Trust	7648
13	Wachovia	MAK 1 Enterprises Group, LLC	7540
14	Wachovia	MAK 1 Enterprises Group, LLC	7553
15	Wells Fargo Bank	MAK 1 Enterprises Group, LLC	0247
16	California Bank & Trust	MAK 1 Enterprises Group, LLC	0520
17	Sunrise Bank of San Diego	MAK 1 Enterprises Group, LLC	1787
18	Bank of America	MAK 1 Enterprises Group, LLC	0404
19	Bank of America	First Opportunities Management Group, LLC	1871
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22 **VII.**

23 IT IS FURTHER ORDERED that Charles LaBella of LaBella & McNamara, LLP is

24 appointed as permanent receiver of MAK 1, and its subsidiaries and affiliates, with full powers

25 of an equity receiver, including, but not limited to, full power over all funds, assets, collateral,

26 premises (whether owned, leased, occupied, or otherwise controlled), choses in action, books,

27 records, papers and other property belonging to, being managed by or in the possession of or

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1 control of MAK 1, and its subsidiaries and affiliates, and that such receiver is immediately
2 authorized, empowered and directed:

- 3 A. to have access to and to collect and take custody, control, possession, and charge
4 of all funds, assets, collateral, premises (whether owned, leased, occupied, or
5 otherwise controlled), choses in action, books, records, papers and other real or
6 personal property, wherever located, of or managed by MAK 1, and its
7 subsidiaries and affiliates, with full power to sue, foreclose, marshal, collect,
8 receive, and take into possession all such property (including access to and taking
9 custody, control, and possession of all such MAK 1 property, and that of its
10 subsidiaries and affiliates);
- 11 B. to have control of, and to be added as the sole authorized signatory for, all
12 accounts of the entities in receivership, including all accounts at any bank, title
13 company, escrow agent, financial institution or brokerage firm (including any
14 futures commission merchant) which has possession, custody or control of any
15 assets or funds of MAK 1, and its subsidiaries and affiliates, or which maintains
16 accounts over which MAK 1, and its subsidiaries and affiliates, and/or any of
17 their employees or agents have signatory authority;
- 18 C. to conduct such investigation and discovery as may be necessary to locate and
19 account for all of the assets of or managed by MAK 1, and its subsidiaries and
20 affiliates, and to engage and employ attorneys, accountants and other persons to
21 assist in such investigation and discovery;
- 22 D. to take such action as is necessary and appropriate to preserve and take control of
23 and to prevent the dissipation, concealment, or disposition of any assets of or
24 managed by MAK 1, and its subsidiaries and affiliates;
- 25 E. to make an accounting, as soon as practicable, to this Court, the Commission, and
26 any interested government agencies, including the Commodity Futures Trading
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1 Commission, of the assets and financial condition of MAK 1, and to file the
2 accounting with the Court and deliver copies thereof to all parties;

3 F. to make such payments and disbursements from the funds and assets taken into
4 custody, control, and possession or thereafter received by him or her, and to incur,
5 or authorize the making of, such agreements as may be necessary and advisable in
6 discharging his or her duties as permanent receiver;

7 G. to employ attorneys, accountants, and others to investigate and, where
8 appropriate, to institute, pursue, and prosecute all claims and causes of action of
9 whatever kind and nature on behalf of MAK 1 and its investors which may now
10 or hereafter exist as a result of the activities of present or past employees or
11 agents of MAK 1, and its subsidiaries and affiliates; and

12 H. to have access to and monitor all mail, electronic mail, and video phone of the
13 entities in receivership in order to review such mail, electronic mail, and video
14 phone which he or she deems relates to their business and the discharging of his
15 or her duties as permanent receiver.

16 **VIII.**

17 IT IS FURTHER ORDERED that Defendants Khanna and MAK 1, their subsidiaries and
18 affiliates, including all of the other entities in receivership, and their officers, agents, servants,
19 employees and attorneys, and any other persons who are in custody, possession or control of any
20 assets, collateral, books, records, papers or other property of or managed by any of the entities in
21 receivership, shall forthwith give access to and control of such property to the permanent
22 receiver.

23 **IX.**

24 IT IS FURTHER ORDERED that no officer, agent, servant, employee, or attorney of
25 MAK 1 and/or Khanna shall take any action or purport to take any action, in the name of or on
26 behalf of MAK 1 without the written consent of the permanent receiver or order of this Court.
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X.

IT IS FURTHER ORDERED that, except by leave of this Court, during the pendency of this receivership, all clients, investors, trust beneficiaries, note holders, creditors, claimants, lessors, and all other persons or entities seeking relief of any kind, in law or in equity, from Khanna and MAK 1, or their subsidiaries or affiliates, and all persons acting on behalf of any such investor, trust beneficiary, note holder, creditor, claimant, lessor, consultant group, or other person, including sheriffs, marshals, servants, agents, employees, and attorneys, are hereby restrained and enjoined from, directly or indirectly, with respect to these persons and entities:

- A. commencing, prosecuting, continuing or enforcing any suit or proceeding (other than the present action by the Commission) against any of them;
- B. using self-help or executing or issuing or causing the execution or issuance of any court attachment, subpoena, replevin, execution or other process for the purpose of impounding or taking possession of or interfering with or creating or enforcing a lien upon any property or property interests owned by or in the possession of MAK 1; and
- C. doing any act or thing whatsoever to interfere with taking control, possession or management by the permanent receiver appointed hereunder of the property and assets owned, controlled or managed by or in the possession of MAK 1, or in any way to interfere with or harass the permanent receiver or his or her attorneys, accountants, employees, or agents or to interfere in any manner with the discharge of the permanent receiver's duties and responsibilities hereunder.

XI.

IT IS FURTHER ORDERED that Defendants Khanna and MAK 1, and their subsidiaries, affiliates, officers, agents, servants, employees, and attorneys, shall cooperate with and assist the permanent receiver and shall take no action, directly or indirectly, to hinder, obstruct, or otherwise interfere with the permanent receiver or his or her attorneys, accountants, employees, or agents, in the conduct of the permanent receiver's duties or to interfere in any

1 manner, directly or indirectly, with the custody, possession, management, or control by the
2 permanent receiver of the funds, assets, collateral, premises, and choses in action described
3 above.

4 **XII.**

5 IT IS FURTHER ORDERED that Defendants Khanna and MAK 1, and their subsidiaries
6 and affiliates, shall pay the costs, fees and expenses of the permanent receiver incurred in
7 connection with the performance of his or her duties described in this Order, including the costs
8 and expenses of those persons who may be engaged or employed by the permanent receiver to
9 assist him or her in carrying out his or her duties and obligations. All applications for costs, fees,
10 and expenses for services rendered in connection with the receivership other than routine and
11 necessary business expenses in conducting the receivership, such as salaries, rent, and any and
12 all other reasonable operating expenses, shall be made by application setting forth in reasonable
13 detail the nature of the services and shall be heard by the Court.

14 **XIII.**

15 IT IS FURTHER ORDERED that no bond shall be required in connection with the
16 appointment of the permanent receiver. Except for an act of gross negligence, the permanent
17 receiver shall not be liable for any loss or damage incurred by any of the Defendants, their
18 officers, agents, servants, employees and attorneys or any other person, by reason of any act
19 performed or omitted to be performed by the permanent receiver in connection with the
20 discharge of his or her duties and responsibilities.

21 **XIV.**

22 IT IS FURTHER ORDERED that representatives of the Commission are authorized to
23 have continuing access to inspect or copy any or all of the corporate books and records and other
24 documents of Khanna and MAK 1 and the other entities in receivership, and continuing access to
25 inspect their funds, property, assets and collateral, wherever located.

1 **XV.**

2 IT IS FURTHER ORDERED that, except as otherwise ordered by this Court, Defendants
3 Khanna and MAK 1, and their officers, agents, servants, employees, attorneys, subsidiaries and
4 affiliates, including the other entities in receivership, and those persons in active concert or
5 participation with any of them, who receive actual notice of this Order, by personal service or
6 otherwise, and each of them, be and hereby are preliminarily restrained and enjoined from,
7 directly or indirectly: destroying, mutilating, concealing, transferring, altering, or otherwise
8 disposing of, in any manner, any documents, which includes all books, records, computer
9 programs, computer files, computer printouts, contracts, correspondence, memoranda, brochures,
10 or any other documents of any kind in their possession, custody or control, however created,
11 produced, or stored (manually, mechanically, electronically, or otherwise), pertaining in any
12 manner to Defendants Khanna and MAK 1, and their subsidiaries and affiliates.

13 **XVI.**

14 IT IS FURTHER ORDERED that the Commission's application for expedited discovery
15 be and hereby is granted and that the parties and the permanent receiver may, until December 1,
16 2009, conduct discovery subject to five calendar days notice pursuant to Rules 30(a), 34, and 45
17 of the Federal Rules of Civil Procedure including notice given personally, by facsimile or by
18 electronic mail, and the parties and the permanent receiver may take more than ten depositions.

19 **XVII.**

20 IT IS FURTHER ORDERED that the requirement set forth in this Court's August 18,
21 2009 Order ("TRO") that Defendant Khanna prepare and deliver to the Commission a detailed
22 and complete schedule of all of his personal assets, including all real and personal property
23 exceeding \$5,000 in value, and all bank, securities, futures and other accounts identified by
24 institution, branch address and account number is continued in full force and effect and shall so
25 remain until Khanna provides a full, complete accounting that complies fully with the standards
26 set forth in the TRO, and also delivers to the Commission all books, records, or other documents
27 relating thereto. The accounting shall include a description of the source(s) of all such assets.
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1 Such accounting shall be filed with the Court and a copy shall be delivered to the Commission's
2 Los Angeles Regional Office. After completion of the accounting, Defendant Khanna shall
3 produce to the Commission's Los Angeles Regional Office, at a time agreeable to the
4 Commission, all books, records and other documents supporting or underlying his accounting.

5 **XVIII.**

6 IT IS FURTHER ORDERED that the requirement set forth in the TRO that Defendants
7 Khanna and MAK 1, and their officers, agents, servants, employees, attorneys, subsidiaries and
8 affiliates, including the other entities in receivership cause to be prepared and delivered to the
9 permanent receiver, a detailed and complete schedule of all desk top computers, laptop
10 computers, cellular phones, and/or personal digital assistants ("PDA") owned and/or used by
11 them in connection with their business, shall continue in full force and effect and shall so remain
12 until they each provide a full, complete schedule that complies fully with the standards set forth
13 in the TRO. As set forth in the TRO, Defendant Khanna must prepare and deliver to the
14 permanent receiver, a detailed and complete schedule of all desk top computers, laptop
15 computers, cellular phones, and/or PDA's owned, controlled or used by him for any purpose.
16 The schedules required by this section shall include at a minimum the make, model and
17 description of each computer, cellular phone, and/or PDA, along with its location, the name of
18 the person primarily assigned to use the computer, cellular phone, and/or PDA, all passwords
19 necessary to access the computer, cellular phone, and/or PDA, and all passwords necessary to
20 access and use the software contained on the computer, cellular phone, and/or PDA. The
21 permanent receiver shall be authorized to make an electronic, digital or hard copy of all of the
22 data contained on the computers, cellular phones, and/or PDAs.

23 **XIX.**

24 IT IS FURTHER ORDERED that the requirement in the TRO that Defendants Khanna
25 and MAK 1, and their officers, agents, servants, employees, attorneys, subsidiaries and affiliates,
26 including the other entities in receivership cause to be prepared and delivered to the permanent
27 receiver, a detailed and complete schedule of all passwords, usernames, and identification
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1 numbers for all web sites, email accounts, and all accounts at any bank, financial institution or
2 brokerage firm (including any futures commission merchant) operated by or to which MAK 1
3 has access, shall continue in full force and effect unless and until they have each provided a full,
4 complete schedule that complies fully with the standards set forth in the TRO.

5 XX.

6 IT IS FURTHER ORDERED that the requirement set forth in the TRO that Defendants
7 Khanna and MAK 1 and each of them, transfer to the registry of this Court all assets, funds, and
8 other property held in foreign locations in the name of Khanna and MAK 1, or for the benefit or
9 under the direct or indirect control of any of them, or over which any of them exercise control or
10 signatory authority, shall continue in full force and effect unless and until this Court orders
11 otherwise.

12 XXI.

13 IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for
14 the purpose of implementing and carrying out the terms of all orders and decrees which may be
15 entered herein and to entertain any suitable application or motion for additional relief within the
16 jurisdiction of this Court.

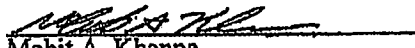
17 SO AGREED AND STIPULATED BY:

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19 Dated September 2, 2009



John M. McCoy
David S. Brown
Attorneys for Plaintiff
Securities and Exchange Commission

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23 Dated September 2nd, 2009



Mohit A. Khanna
Defendant, individually, and as an officer and
director of Defendant MAK 1 Enterprises Group,
LLC, and Relief Defendant First Opportunities
Management Group, Inc.

1 numbers for all web sites, email accounts, and all accounts at any bank, financial institution or
2 brokerage firm (including any futures commission merchant) operated by or to which MAK 1
3 has access, shall continue in full force and effect unless and until they have each provided a full,
4 complete schedule that complies fully with the standards set forth in the TRO.

5 **XX.**

6 IT IS FURTHER ORDERED that the requirement set forth in the TRO that Defendants
7 Khanna and MAK 1 and each of them, transfer to the registry of this Court all assets, funds, and
8 other property held in foreign locations in the name of Khanna and MAK 1, or for the benefit or
9 under the direct or indirect control of any of them, or over which any of them exercise control or
10 signatory authority, shall continue in full force and effect unless and until this Court orders
11 otherwise.

12 **XXI.**

13 IT IS FURTHER ORDERED that this Court shall retain jurisdiction over this action for
14 the purpose of implementing and carrying out the terms of all orders and decrees which may be
15 entered herein and to entertain any suitable application or motion for additional relief within the
16 jurisdiction of this Court.

17 SO AGREED AND STIPULATED BY:

18
19 Dated September __, 2009

John M. McCoy
David S. Brown
Attorneys for Plaintiff
Securities and Exchange Commission

20
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22
23 Dated September 2nd, 2009

Mohit A. Khanna
Defendant, individually, and as an officer and
director of Defendant MAK 1 Enterprises Group,
LLC, and Relief Defendant First Opportunities
Management Group, Inc.

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Dated September 2, 2009

Thomas A. Zaccaro

Thomas A. Zaccaro
Morgan J. Miller
Paul Hastings LLP
Attorneys for Defendant Mohit A. Khanna

Dated September __, 2009

Nicolas Morgan
DLA Piper LLP
Attorneys for Relief Defendant Sharanjit K. Khanna

IT IS SO ORDERED.

Dated September __, 2009

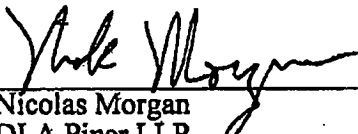
HONORABLE ROGER T. BENITEZ
UNITED STATES DISTRICT JUDGE

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Dated September __, 2009

Thomas A. Zaccaro
Morgan J. Miller
Paul Hastings LLP
Attorneys for Defendant Mohit A. Khanna

Dated September 2 2009



Nicolas Morgan
DLA Piper LLP
Attorneys for Relief Defendant Sharanjit K. Khanna

IT IS SO ORDERED.

Dated September __, 2009

HONORABLE ROGER T. BENITEZ
UNITED STATES DISTRICT JUDGE

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Dated September __, 2009


Thomas A. Zaccaro
Morgan J. Miller
Paul Hastings LLP
Attorneys for Defendant Mohit A. Khanna

Dated September __, 2009

Nicolas Morgan
DLA Piper LLP
Attorneys for Relief Defendant Sharanjit K. Khanna

IT IS SO ORDERED.

Dated September 3, 2009



HONORABLE ROGER T. BENITEZ
UNITED STATES DISTRICT JUDGE