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8

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **SOUTHERN DIVISION**  
12

13 SECURITIES AND EXCHANGE  
14 COMMISSION,

15 Plaintiff,

16 vs.  
17

18 JUSTIN ROBERT KING; AND  
19 ELEVATE INVESTMENTS LLC,

20 Defendants,  
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22 SHANNON LEIGH KING,

23 Relief Defendant.  
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Case No. SACV 20-02398JVS(DFMx)

**JOINT STIPULATION TO  
CONTINUE THE LAW AND  
MOTION CUTOFF**

Judge: Hon. James V. Selna

1 This stipulation is submitted on behalf of Plaintiff Securities and Exchange  
2 Commission (the “SEC”) and Defendants Justin Robert King (“J. King) and  
3 Elevate Investments, LLC (“Elevate”) and Relief Defendant (“S. King”).

4 WHEREAS, on December 22, 2020, the SEC filed its Complaint against  
5 Defendants Elevate and J. King and Relief Defendant S. King;

6 WHEREAS, on January 19, 2021, the Court issued a Preliminary Injunction  
7 against Defendants Elevate and J. King and Relief Defendant S. King;

8 WHEREAS, on March 18, 2021, the Court issued a scheduling order that set  
9 February 22, 2022 as the law and motion cut-off, with January 24, 2022 as the last  
10 day to file motions;

11 WHEREAS on May 27, 2021 the Court entered a bifurcated judgment  
12 against J. King. That judgment permanently enjoined Mr. King and deferred  
13 consideration of appropriate remedies against him to a future date;

14 WHEREAS, the SEC and Elevate have reached a settlement and the Consent  
15 and Proposed Judgment was filed on January 18, 2022 (Dkt. No. 70);

16 WHEREAS, the SEC and S. King have reached a settlement in principle and  
17 counsel are in the process of obtaining a signed Consent;

18 WHEREAS, the bifurcated judgment and the settlements with Elevate  
19 Investments, LLC and S. King will obviate the need for a trial in this matter;

20 WHEREAS, the parties are actively pursuing a settlement that would  
21 eliminate the need for the SEC’s potential remedies motion against J. King; and

22 WHEREAS, no party has previously requested relief from any case  
23 management deadline;

24 NOW THEREFORE, IT IS HEREBY STIPULATED, by and among the  
25 parties, as follows:  
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1 The last day to file motions shall be continued to March 28, 2022, or to a  
2 date thereafter to be set by the Court.

3 IT IS SO STIPULATED.  
4

5 January 19, 2022

s/ Lynn M. Dean

Lynn M. Dean  
Kathryn Wanner  
Attorneys for Plaintiff  
Securities and Exchange Commission

9  
10 s/ Michael Quinn

Michael J. Quinn, Esq.  
VEDDER PRICE (CA), LLP  
1925 Century Park East, Suite 1900  
Los Angeles, California 90067  
Attorneys for Defendant J. King and Relief  
Defendant S. King

14  
15 s/ Kyra Andrassy

Kyra E. Andrassy, Esq.  
SMILEY WANG-EKVALL  
3200 Park Center Drive, Suite 250  
Attorneys for Receiver for Defendant  
Elevate Investments LLC

**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,  
444 S. Flower Street, Suite 900, Los Angeles, California 90071  
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On January 19, 2022, I caused to be served the document entitled **JOINT STIPULATION TO CONTINUE THE LAW AND MOTION CUTOFF** on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

☐ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 19, 2022

/s/ Lynn M. Dean

Lynn M. Dean

***SEC v. Justin Robert King, et al.***  
**United States District Court—Central District of California**  
**Case No. 8:20-cv-02398-JVS-DFM**

**SERVICE LIST**

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Case No. SACV 20-02398JVS(DFMx)

**[PROPOSED] ORDER CONTINUING  
THE LAW AND MOTION CUTOFF**

Judge: Hon. James V. Selna

1 This matter came before the Court upon the Stipulation Regarding  
2 Preliminary Injunction of plaintiff Securities and Exchange Commission (“SEC”)  
3 and Defendants Elevate Investments LLC and Justin Robert King, and Relief  
4 Defendant Shannon Leigh King.

5 The Court, having considered the Stipulation, and the other evidence and  
6 argument presented to the Court, orders as follows:

7 The last day to file motions is continued to March 28, 2022.

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9 IT IS SO ORDERED.

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11 Dated: January \_\_, 2022

12 THE HONORABLE JAMES V. SELNA  
13 UNITED STATES DISTRICT JUDGE  
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Date: January 19, 2022

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