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ORIGINAL FILED

SEP 11 2013

LOS ANGELES SUPERIOR COURT

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA, by and through the California Corporations Commissioner,

Plaintiff,

vs.

PROTEGE FINANCIAL & INSURANCE SERVICE, INC., aka PROTÉGÉ FINANCIAL & INSURANCE SERVICES, INC., aka PROTEGE FINANCIAL & INSURANCE SERVICES, INC., doing business as SENIOR RETIREMENT SPECIALISTS and TEACHER RETIREMENT SPECIALISTS; SAXE-COBURG INSURANCE SOLUTIONS, LLC; SKYLINE PICTURES, LLC; NOT FORGOTTEN, LLC; WINDSOR PICTURES, LLC; MICHELLE KENEN SEWARD, as an individual; DROR SOREF, as an individual; SCOTT WALTER FOULK, as an individual; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: BC492536

[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

Filed concurrently with:

1. *Notice of Motion & Motion; Memorandum of Points and Authorities;*
2. *Appendix of Authorities;*
3. *Declaration of Nida Brown;*
4. *Declaration of Ucylyene Carter;*
5. *Declaration of Miriam Clark;*
6. *Declaration of Margaret Cruz;*
7. *Declaration of Rebecca Gutierrez;*
8. *Declaration of Winnie Hashiba;*
9. *Declaration of Ann Licata;*
10. *Declaration of Ruth Marcucci;*
11. *Declaration of James Nord;*
12. *Declaration of Patrecia Nord;*
13. *Declaration of Kathleen Ridenour; and*
14. *Declaration of Maxine Schiltz*

Hearing Date: September 11, 2013
Hearing Time: 9:30 a.m.
Department: '12'
Judge: Hon. Barbara A. Meiers

Trial Date: April 21, 2014
Action Filed: September 20, 2012

1 The Plaintiff's Motion for Preliminary Injunction came for hearing on September 11, 2013,
2 in Department '12' of the above-entitled Court located at 111 North Hill Street, Los Angeles,
3 California, the Honorable Barbara A. Meiers presiding. Senior Corporations Counsel Blaine A.
4 Noblett and Marlou de Luna represented Plaintiff, the People of the State of California, by and
5 through the California Commissioner of the Department of Business Oversight. Defendants Saxe-
6 Coburg Insurance Solutions, LLC and Michelle Kenen Seward were represented by Pamela
7 Johnston. Stephen Burton represented Defendant Dror Soref.

8 On good cause shown and proof made to the satisfaction of the Court that the motion ought
9 to be granted:

10 IT IS HEREBY ORDERED that the motion be GRANTED and Defendants Protege
11 Financial & Insurance Service, Inc., aka Protégé Financial & Insurance Services, Inc., aka Protege
12 Financial Services, Inc., doing business as Senior Retirement Specialists and Teacher Retirement
13 Specialists ("Protege Financial"); Saxe-Coburg Insurance Solutions, LLC; Skyline Pictures, LLC;
14 Not Forgotten, LLC; Windsor Pictures, LLC; Michelle Kenen Seward, as an individual ("Seward");
15 Dror Soref, as an individual; and Scott Walter Foulk, as an individual, and their officers, directors,
16 successors in interest, agents, employees, attorneys in fact, and all persons acting in concert with
17 them, are hereby enjoined from directly or indirectly:

- 18 a. violating Corporations Code section 25110 by offering to sell, selling, arranging for
19 the sale, issuing, engaging in the business of selling, negotiating for the sale of, or
20 otherwise in any way dealing or participating in the offer or sale of, any security of
21 any kind, including but not limited to Not Forgotten "operating" agreements; Windsor
22 Pictures "bridge" loans, "promissory" notes, "Class A Membership" interests, and
23 "convertible" debentures; Protege Financial "bridge" loans and "promissory" notes;
24 and Saxe-Coburg "promissory" notes, unless such security or transaction is qualified
25 or exempted or not subject to qualification;
- 26 b. removing, destroying, mutilating, concealing, altering, transferring, or
27 otherwise disposing of, in any manner, any books, records, computer programs,
28 computer files, computer printouts, correspondence, brochures, manuals, or any other

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writings or documents of any kind as defined under Evidence Code section 250 relating to the transactions and course of conduct as alleged in this Complaint; and
c. as to Defendants Protege Financial and Seward only, from violating Corporations Code section 25230 by conducting business as investment advisers in this state without first having applied for and secured from the Commissioner a certificate, then in effect, authorizing them to conduct business as investment advisers, unless Defendants Protege Financial and Seward are exempted from the requirement of obtaining a certificate.

Dated: 9/11/13

HON. BARBARA A. MEIERS
JUDGE OF THE SUPERIOR COURT