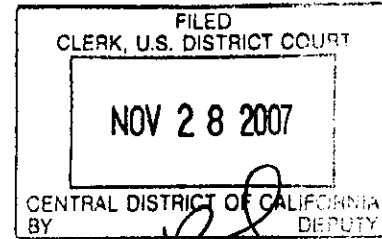


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19 Attorneys for Plaintiff

20 UNITED STATES DISTRICT COURT
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA
22 WESTERN DIVISION

23 SECURITIES AND EXCHANGE
24 COMMISSION,

25 Plaintiff,

26 vs.

27 ROBERT A. KASIRER, ET AL.

28 Defendants,

DEBRA S. KASIRER, ET AL.

Relief Defendants.

Case No. CV 05-3059 (RSWL) (RCx)

**JOINT STIPULATION TO
DISMISS CERTAIN CLAIMS
AGAINST DEFENDANT
KASIRER AND RELATED
RELIEF DEFENDANTS;
[REDACTED] ORDER**

1 **JOINT STIPULATION TO DISMISS CERTAIN CLAIMS AGAINST**
2 **DEFENDANT KASIRER AND RELATED RELIEF DEFENDANTS**

3 Pursuant to Local Rules 7-1 and 52-9, Plaintiff, the United States Securities and
4 Exchange Commission (“SEC” or “Commission”) and all Defendants and Relief
5 Defendants, through their counsel, hereby stipulate and agree to an Order
6 dismissing with prejudice the Commission’s prayer for a civil penalty against
7 Defendant Robert A. Kasirer (“Defendant Kasirer”) and dismissing with prejudice
8 the Commission’s claims against the Relief Defendants related to Defendant
9 Kasirer:
10
11

- 12 1. This case was initially filed as No. 04-CV-4340 in the United States District
13 Court for the Northern District of Illinois (the “Illinois Court”). Among
14 other things, the Commission’s Complaint prayed that Defendant Kasirer be
15 ordered to pay a civil penalty.
16
- 17 2. On November 14, 2004, the Commission filed its Second Amended
18 Complaint which, among other things, added as Relief Defendants: Debra
19 Schoenfeld Kasirer; Bistra & Munkacs Holdings, Inc. f/k/a BHMC Corp.;
20 JDDJ Holdings, L.P. f/k/a CareContinuum, L.P. f/k/a BHMC, L.P.;
21 CareContinuum, L.L.C. f/k/a CF Holdings, L.L.C.; Health Care Holdings,
22 L.L.C. f/k/a Health Care Holdings, L.P.; Healthcarecontinuum, L.L.C.;
23 Mishkan Healthcare, Inc.; and Kasirer Yeladim Holdings, L.L.C.
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1 3. On March 21, 2005, the Illinois Court entered an Order transferring this case
2 to this Court, where the case was docketed as CV 05-3059 RL (RCx).

3 4. On October 28, 2005, the Commission filed its Third Amended Complaint
4 which, among other things, added as a Relief Defendant The Debra Kasirer
5 Separate Property Trust.
6

7 5. On October 31, 2007, the Court entered a Final Judgment by consent against
8 Defendant Kasirer. The October 31, 2007 Final Judgment, among other
9 things, ordered Defendant Kasirer to pay \$4,991,434.00 of disgorgement and
10 prejudgment interest to the Clerk of the Court. Defendant Kasirer made the
11 required payment on or about November 14, 2007.
12

13 6. Accordingly, the parties do agree and stipulate to an Order 1) dismissing
14 with prejudice the Commission's prayer for a civil penalty against
15 Defendant Kasirer and 2) dismissing with prejudice the Commission's
16 claims against Relief Defendants Debra Schoenfeld Kasirer; Bistra &
17 Munkacs Holdings, Inc. f/k/a BHMC Corp.; JDDJ Holdings, L.P. f/k/a
18 CareContinuum, L.P. f/k/a BHMC, L.P.; CareContinuum, L.L.C. f/k/a CF
19 Holdings, L.L.C.; Health Care Holdings, L.L.C. f/k/a Health Care Holdings,
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L.P.; Healthcarecontinuum, L.L.C.; Mishkan Healthcare, Inc.; Kasirer
Yeladim Holdings, L.L.C.; and The Debra Kasirer Separate Property Trust.

IT IS SO ORDERED:

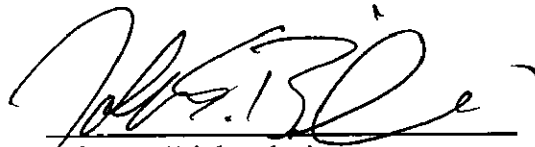
Dated: Nov 28, 2007

RONALD S.W. LEW

The Honorable Ronald S.W. Lew
United States District Court Judge
Central District of California

SO AGREED AND STIPULATED:

Dated: November 26, 2007



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*Attorneys for Plaintiff United States
Securities and Exchange Commission*

Dated: November 26, 2007

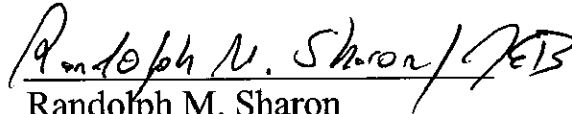


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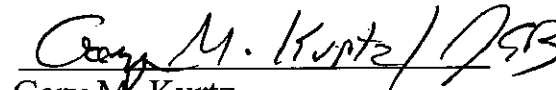
Attorneys for Defendant Jerold V. Goldstein

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3
4
5 Dated: November 26, 2007


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Attorney for Relief Defendants Linda I. Goldstein and the Linda I. Goldstein Family Trust

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10
11 Dated: November 26, 2007


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CERTIFICATE OF SERVICE

I, the undersigned, certify that on November 26, 2007, I caused the foregoing Joint Stipulation To Dismiss Certain Claims against Defendant Kasirer and Related Relief Defendants to be served by overnight courier on the counsel listed below.



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BY OVERNIGHT COURIER

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