

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MARK E. DOTTORE, RECEIVER)	CASE NO. 1:19-cv-380
)	
Plaintiff,)	JUDGE
)	
v.)	
)	
STUDIO ENTERPRISE MANAGER, LLC,)	
et al.)	
)	
Defendants.)	

**RECEIVER’S MOTION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Plaintiff Mark E. Dottore, as the Court-appointed Receiver for the Receivership Entities¹ (the “Receiver”), moves this Court, under Fed. R. Civ. P. 65(a) and (b), to issue a temporary restraining order and preliminary injunction against Defendants Studio Enterprise Manager, LLC and Education Principle Foundation to (1) pay the Receiver \$2.1 million, which is due and owing, and (2) transfer to the Receiver any and all monies received in February 2019 from or on behalf of Art Institutes International, LLC(“AII”) and its subsidiaries

¹ The “Receivership Entities” are South University of Ohio LLC, Dream Center Education Holdings LLC, The DC Art Institute of Raleigh-Durham LLC, The DC Art Institute of Charlotte LLC, DC Art Institute of Charleston LLC, DC Art Institute of Washington LLC, The Art Institute of Tennessee – Nashville LLC, AiTN Restaurant LLC, The Art Institute of Colorado LLC, DC Art Institute of Phoenix LLC, The Art Institute of Portland LLC, The Art Institute of Seattle LLC, The Art Institute of Pittsburgh, DC LLC, The Art Institute of Philadelphia, DC, LLC, DC Art Institute of Fort Lauderdale LLC, The Illinois Institute of Art LLC, The Art Institute of Michigan LLC, The Illinois Institute of Art at Schaumburg LLC, DC Art Institute of Phoenix, LLC and its direct subsidiaries the Art Institute of Las Vegas LLC, the Art Institute of Indianapolis, LLC, and AiIN Restaurant LLC; Dream Center Argosy University of California LLC and its direct subsidiaries, and Argosy Education Group LLC; Dream Center Education Management LLC; and, South University of Michigan LLC. *See* Order Appointing Receiver (Doc. 8) at 3-4, *Digital Media Solutions, LLC v. South University of Ohio, LLC et al.*, Case No. 1:19-cv-145 (N.D. Ohio Jan. 18, 2019); *see also* Order Clarifying Order Appointing Receiver (Doc. 14) at 1, *Digital Media Solutions, LLC v. South University of Ohio, LLC et al.*, Case No. 1:19-cv-145 (N.D. Ohio Jan. 25, 2019) (removing AU Student Funding, LLC as a “Receivership Entity”).

(“Ai University System”), Dream Center South University LLC (“South”) and its subsidiaries (“South University System”), Dream Center Argosy University of California LLC (“Argosy”) and its subsidiaries (“Argosy University System”), and Argosy Education Group LLC (AEG”).

A memorandum in support is attached.

Dated: February 21, 2019

Respectfully submitted,

/s/ Robert T. Glickman

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CERTIFICATE OF SERVICE

The foregoing was electronically filed this 21st day of February, 2019. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

/s/ Robert T. Glickman

Robert T. Glickman (0059579)