

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Yalcin Ayasli v. Sezgin Baran Korkmaz, et al.

Ayasli v. Korkmaz · No. 2:20-cv-09388-CAS-PDx · Decided August 25, 2025

SUMMARY

The United States District Court for the Central District of California denied Yalcin Ayasli’s motion to partially lift the stay in his civil RICO and related claims against Sezgin Baran Korkmaz and others. Applying the Keating factors and considering Korkmaz’s Fifth Amendment concerns, the interests of the government and nonparties, and the need to protect related criminal proceedings, the court maintained a complete stay pending resolution of the related criminal matters.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Christina A. Snyder
JURISDICTION	United States District Court for the Central District of California
DECIDED	August 25, 2025
DOCKET	2:20-cv-09388-CAS-PDx
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a limited lift of the court-ordered stay to file a second amended complaint and litigate procedural and jurisdictional motions while continuing to stay merits discovery pending related criminal proceedings. The district court denied the motion and maintained the complete stay.
STANDARD OF REVIEW	Abuse-of-discretion-style discretionary review of the district court's inherent authority to stay civil proceedings; the decision whether to stay is based on the particular circumstances and competing interests under the Keating factors.
PRECEDENTIAL VALUE	unknown
PARTIES	Yalcin Ayasli v. Sezgin Baran Korkmaz, et al.

TOPICS

- civil procedure
- fifth amendment
- criminal procedure
- commercial litigation

PRACTICE AREAS

civil procedure

criminal procedure

commercial litigation

RICO

QUESTIONS PRESENTED

1. Whether the court should partially lift its stay of the civil action to permit Ayasli to file a second amended complaint and litigate procedural and jurisdictional motions while continuing to stay merits discovery.
2. Whether Korkmaz's Fifth Amendment concerns and the Keating factors continued to favor maintaining a complete stay because of the overlapping and ongoing criminal proceedings.
3. Whether permitting the requested limited proceedings would risk interference with the government's related criminal prosecutions and undermine judicial efficiency or the public interest.

HOLDINGS

1. A district court may maintain a stay of a civil action when the civil and criminal proceedings substantially overlap and the defendant's Fifth Amendment concerns and the competing interests identified in Keating favor deferral of the civil litigation.
2. Korkmaz's Fifth Amendment concerns continued to weigh against lifting the stay, although those concerns were not independently dispositive.
3. A limited lift allowing amendment and pre-merits procedural or jurisdictional motions would not materially advance resolution of the civil action because merits litigation and discovery would remain stayed.
4. The interests of the government and the public favored maintaining a complete stay because lifting the stay could interfere with related criminal prosecutions and undermine their integrity.

KEY QUOTATIONS

“The Court concludes that, on balance, Korkmaz’s Fifth Amendment concerns and the Keating factors continue to weigh in favor of the stay so that pending criminal proceedings may resolve without interference.”

“The Court concludes that maintaining a stay of this civil action until the related criminal proceedings are resolved does not impose unfair prejudice on plaintiff.”

FACTUAL BACKGROUND

Ayasli's civil action alleges RICO, RICO conspiracy, fraud-related, and New Hampshire consumer-protection claims arising from the 2016 sale of his airline, BoraJet, to defendants associated with Sezgin Baran Korkmaz. The allegations substantially overlap with related federal criminal proceedings involving Korkmaz and other individuals concerning a renewable-fuel tax-credit and money-laundering scheme. The court had stayed the civil action in 2022 because Korkmaz's Fifth Amendment interests and the other Keating factors favored a stay. Ayasli sought to lift the stay for amendment and pre-merits procedural and jurisdictional motion practice, but the court found that the ongoing and partly sealed criminal proceedings could be prejudiced by civil filings and that a limited lift would not materially advance resolution of the civil case.

PROCEDURAL HISTORY

Ayasli initially filed the action in the District of New Hampshire in 2019. That court determined that it lacked jurisdiction over several defendants and transferred the action to the Central District of California in October 2020. After Ayasli filed a first amended complaint, defendants moved to stay the case pending related federal criminal proceedings, and the court granted a stay in November 2022 under the Keating factors. In August 2025, the court reconsidered the stay in response to Ayasli's motion for a limited lift and denied that motion.

DISPOSITION

other

CASES CITED

- Keating v. Office of Thrift Supervision, 45 F.3d 322, 324-25 (9th Cir. 1995)
- Fed. Sav. & Loan Ins. Corp. v. Molinaro, 889 F.2d 899, 902-03 (9th Cir. 1989)
- Clinton v. Jones, 520 U.S. 681, 708 (1997)
- Landis v. N. Am. Co., 299 U.S. 248, 254 (1936)
- SEC v. Dresser Indus., Inc., 628 F.2d 1368, 1375-76 (D.C. Cir. 1980)
- Square 1 Bank v. Lo, No. 12-CV-05595-JSC, 2014 WL 7206874, at *2 (N.D. Cal. Dec. 17, 2014)
- ESG Cap. Partners LP v. Stratos, 22 F. Supp. 3d 1042, 1047 (C.D. Cal. 2014)
- Martin v. La Luz Del Mundo, No. 2:20-CV-01437-ODW-(ASX), 2020 WL 6743591, at *5 (C.D. Cal. Sept. 29, 2020)
- Petrov v. Alameda Cnty., No. 16-CV-04323-YGR, 2016 WL 6563355, at *7 (N.D. Cal. Nov. 4, 2016)
- SEC v. Nicholas, 569 F. Supp. 2d 1065, 1072-73 (C.D. Cal. 2008)