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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SECURITIES AND EXCHANGE COMMISSION,
13 Plaintiff,
14 v.
15 JOHN V. BIVONA; SADDLE RIVER
ADVISORS, LLC; SRA MANAGEMENT
16 ASSOCIATES, LLC; FRANK GREGORY
MAZZOLA,
17
18 Defendants, and
19 SRA I LLC; SRA II LLC; SRA III LLC;
FELIX INVESTMENTS, LLC; MICHELE J.
20 MAZZOLA; ANNE BIVONA; CLEAR
SAILING GROUP IV LLC; CLEAR
21 SAILING GROUP V LLC,
22 Relief Defendants.

Case No. 3:16-cv-01386-EMC

**STIPULATION AND ORDER TO EXTEND
DEADLINES FOR FILING PROPOSED
DISTRIBUTION PLAN AMENDMENTS
AND OBJECTIONS**

Date: March 29, 2018
Time: 1:30 p.m.
Courtroom: 5
Judge: Edward M. Chen

STIPULATION TO EXTEND FILING DEADLINES

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2 On February 9, 2018, the Court entered a Minute Order setting a March 8, 2018, deadline for
3 plaintiff Securities and Exchange Commission (the “Commission”) to file its proposed amendments
4 to the Joint Proposed Plan of Distributions (“Joint Plan”) and statement regarding the issues raised by
5 the Court; a March 15, 2018 deadline for interested parties SRA Funds Investor Group (“Investor
6 Group”) and Global Generation Group, LLC (“Global Generation”) to file any response(s) to the
7 Commission’s proposed amendments and their statement(s) regarding the issues raised by the Court;
8 and a March 29, 2018 hearing date the proposed amendments and responses. Docket No. 309 at 2.
9 The Court also ordered the Commission and Investor Group to meet and confer and resolve as many
10 issues as possible before making their filings. *Id.*

11 Given the number and complexity of the issues that merit discussion, the Commission,
12 Investor Group, Global Generation and Receiver for SRA Management Associates, LLC (“SRA
13 Management”), SRA I LLC, SRA II LLC, SRA III LLC (together, “SRA Funds”), Clear Sailing
14 Group IV LLC, and Clear Sailing Group V LLC (together, “Clear Sailing”), desire sufficient time for
15 multiple meet and confer sessions before making their filings. The parties to this Stipulation
16 therefore request a one-week extension in the filing deadlines as follows:

17 The Commission and the Receiver shall have until Thursday, March 15, 2018, to submit their
18 proposed amendments to the Joint Plan along with any statement(s) addressing the issues raised by
19 the Court.

20 The Investor Group, Global Generation and any other interested person shall have until
21 Thursday, March 22, 2019, to submit any response(s) to the proposed amendments, as well as their
22 own statement(s) regarding the issues raised by the Court.

23 The hearing on the proposed amendments and the other issues raised by the Court shall
24 remain set 1:30 p.m., on Thursday, March 29, 2018.
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1 Dated: February 26, 2018

Respectfully submitted,

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3 /s/ John S. Yun

John S. Yun
Marc Katz
Jessica W. Chan
Attorneys for the Plaintiff Securities and Exchange
Commission

6
7 /s/ John W. Cotton

John W. Cotton
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Special Counsel to the Receiver for Defendant SRA
Management LLC, and Relief Defendants SRA I LLC,
SRA II LLC, SRA III LLC, and LLC, Clear Sailing
Group IV LLC, and Clear Sailing Group V LLC

13 /s/ Jonathan K. Levine

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16 Attorneys for the SRA Funds Investor Group

17 /s/ Theodore A. Griffinger, Jr.

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San Francisco, CA 94111

21 Attorneys for Global Generation Group, LLC

22 **STIPULATED ORDER**

23 GOOD CAUSE APPEARING, the Court hereby amends its Minute Order of February 9,
24 2018 (Docket No. 309) to set the following filing schedule:

25 The Securities and Exchange Commission and the Receiver shall have until Thursday, March
26 15, 2018, to submit their proposed amendments to their Proposed Joint Distribution Plan along with
27 any statement(s) addressing the issues raised by the Court.
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1 The SRA Funds Investor Group, Global Generation, LLC and any other interested person
2 shall have until Thursday, March 22, 2019, to submit any response(s) to the proposed amendments, as
3 well as their own statement(s) regarding the issues raised by the Court.

4 The hearing on the proposed amendments and the other issues raised by the Court shall
5 remain set for 1:30 p.m., on Thursday, March 29, 2018.

6 SO ORDERED.

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8 Dated: February ____, 2018

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10 EDWARD M. CHEN, Judge
11 United States District Court
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CERTIFICATE OF SERVICE

I, John Stearns, am a citizen of the United States, over 18 years of age, and am not a party in this action. I hereby certify that on February 26, 2018, I caused the following document:

STIPULATION AND ORDER TO EXTEND DEADLINES FOR FILING PROPOSED DISTRIBUTION PLAN AMENDMENTS AND OBJECTIONS

to be served via UPS marked for next day delivery on the following:

Frank Gregory Mazzola
27 Dogwood Hill Drive
Upper Saddle River, NJ 07458

Michele J. Mazzola
27 Dogwood Hill Drive
Upper Saddle River, NJ 07458

/s/ John Stearns

John Stearns
Paralegal Specialist
Division of Enforcement