

1 JINA L. CHOI (N.Y. Bar No. 2699718)
JOHN S. YUN (Cal. Bar No. 112260)
2 yunj@sec.gov
MARC D. KATZ (Cal. Bar No. 189534)
3 katzma@sec.gov
JESSICA W. CHAN (Cal. Bar No. 247669)
4 chanjes@sec.gov

5 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
6 44 Montgomery Street, Suite 2800
San Francisco, CA 94104
7 Telephone: (415) 705-2500

8
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** AS MODIFIED AND
RESETTING CASE MANAGEMENT CONFERENCE
Date: March 29, 2018
Time: 1:30 p.m.
Courtroom: 5
Judge: Edward M. Chen

23
24
25
26
27
28

STIPULATION TO EXTEND FILING DEADLINES

1
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.
25
26
27
28

1 Dated: February 26, 2018

Respectfully submitted,

2
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

Gartenberg, Gelfand & Hayton LLP

15260 Ventura Blvd.

Suite 1920

Sherman Oaks, CA 91403

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

12
13 /s/ Jonathan K. Levine

Jonathan K. Levine

Pritzker Levine LLP

180 Grand Avenue, Suite 1390

Oakland, CA 94612

Attorneys for the SRA Funds Investor Group

17 /s/ Theodore A. Griffinger, Jr.

Theodore A. Griffinger, Jr.

Lubin Olson & Niewiadomski LLP

The Transamerica Pyramid

600 Montgomery St., 14th Floor

San Francisco, CA 94111

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.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

The hearing on the proposed amendments and the other issues raised by the Court shall be ^{April 5, 2018} ~~March 29, 2018~~ set for 1:30 p.m., on Thursday, ~~March 29, 2018~~. The Further Case Management Conference is rescheduled to April 5, 2018 at 1:30 p.m., a joint case management conference statement shall be due by ^{March 29, 2018}.
SO ORDERED.

Dated: February 26, 2018



EDWARD M. CHEN, Judge
United States District Court

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

SRA MANAGEMENT ASSOCIATES,
LLC, et al.,

Defendants.

Case No. [16-cv-01386-EMC](#)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Northern District of California.

That on 2/26/2018, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office.

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

Dated: 2/26/2018

Susan Y. Soong
Clerk, United States District Court

By *Tracy Geiger*
Tracy Geiger for Betty Lee, Deputy Clerk
to the Honorable EDWARD M. CHEN

United States District Court
Northern District of California