

1 JOHN W. COTTON (SBN 54912)  
2 Email: [JCotton@gghslaw.com](mailto:JCotton@gghslaw.com)  
3 GARTENBERG GELFAND & HAYTON LLP  
4 15260 Ventura Blvd., Suite 1920  
5 Sherman Oaks, CA 91403  
6 (213) 542-2100  
7 (818) 292-0898

8 Counsel to Receiver Sherwood  
9 Partners, Inc.

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 SECURITIES AND EXCHANGE  
13 COMMISSION,

14 Plaintiff,

15 v.

16 JOHN V. BIVONA; SADDLE RIVER  
17 ADVISERS, LLC; SRA  
18 MANAGEMENT ASSOCIATES, LLC;  
19 FRANK GREGORY MAZZOLA

20 Defendants, and

21 SRA I LLC; SRA II LLC; SRA III  
22 LLC; FELIX INVESTMENTS,  
23 LLC; MICHELE J. MAZZOLA;  
24 ANNE BIVONA; CLEAR  
25 SAILING GROUP IV LLC;  
26 CLEAR SAILING GROUP V LLC,

27 Relief Defendants.

Case No. 3:16-cv-1386

**[PROPOSED] ORDER  
APPROVING RECEIVER'S  
APPLICATION TO PAY  
CLAIMS ADMINISTRATOR  
AND APPROVAL FOR  
FURTHER WORK**

Date: N/A  
Time: N/A  
Judge: Edward M. Chen

28 The Receiver in the above matter, Sherwood Partners Inc. ("Sherwood")  
through its Director Peter Hartheimer ("Hartheimer"), requests by  
administrative application that this Court give its approval for payment the  
invoices of the claims administrator, JND Corporate Services Inc., in the  
amount of \$29,466.28 for work completed during the months of December  
2017 through March 2018. The Receiver has reviewed the invoices of JND for

1 this time period and has declared that they are fair and reasonable, done by an  
2 appropriate level of personnel and that they represent work that is supported by  
3 the invoices that accompany them.

4 The Receiver has also requested that the Court approve additional  
5 estimated claims processing work by JND as reflected in the estimate attached  
6 as Exhibit D to the accompanying Declaration of Hartheimer, as set forth  
7 below. The Receiver shall determine which additional work should receive  
8 priority of completion by JND.

9 The Receiver has represented that all parties have received copies of the  
10 Application, Declaration of Hartheimer and Proposed Order. The SEC has  
11 expressed no objection to the requested relief, and counsel for the SRA  
12 Investors Group, Telesoft and Global Generation have indicated to the  
13 Receiver that they will file any responses in the time set by the Court.

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15 GOOD CAUSE APPEARING, the Court approves the payment of  
16 \$29,466.28 to JND for its work completed through the end of March 2018.

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18 GOOD CAUSE ALSO APPEARING, the Court approves additional  
19 work to be completed by JND, as set out in the accompanying estimates in  
20 Exhibit D, for the various work categories identified, up to the amount of  
21 \$\_\_\_\_\_. The Receiver shall immediately determine which work categories  
22 should receive priority, and then JND shall concentrate on completing those  
23 categories prior to the next hearing on May 10, 2018, and file a report on the  
24 status of the Claims Process by May 3, 2018.

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1 IT IS SO ORDERED.

2 DATED: April \_\_\_\_, 2018

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Judge Edward M. Chen

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United States District Court

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