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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 SECURITIES AND EXCHANGE COMMISSION,  
14 Plaintiff,  
15 v.  
16 JOHN V. BIVONA; SADDLE RIVER  
ADVISORS, LLC; SRA MANAGEMENT  
17 ASSOCIATES, LLC; FRANK GREGORY  
MAZZOLA,  
18 Defendants, and  
19 SRA I LLC; SRA II LLC; SRA III LLC;  
20 FELIX INVESTMENTS, LLC; MICHELE J.  
MAZZOLA; ANNE BIVONA; CLEAR  
21 SAILING GROUP IV LLC; CLEAR  
SAILING GROUP V LLC,  
22 Relief Defendants.  
23

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

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S REQUEST  
WITH PROPOSED ORDER FOR  
EXTENSION OF FILING DEADLINE  
DURING FURLOUGH OF PLAINTIFF'S  
COUNSEL**

Date: February 7, 2019  
Time: 10:30 am  
Courtroom: 5  
Judge: Edward M. Chen

**PLAINTIFF'S REQUEST FOR EXTENSION**

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2 Plaintiff Securities and Exchange Commission ("Commission" or "SEC") hereby notifies the  
3 Court that all SEC counsel and staff normally assigned to this case are being furloughed, due to a lack  
4 of budget appropriations, for an indefinite period beginning Thursday, December 27, 2018. In light  
5 of this indefinite furlough, the SEC requests that the Court extend for twenty-one days from the  
6 *conclusion* of the furlough all court filing deadlines.

7 Good cause exists for the extension because during the furlough, the SEC's counsel and staff  
8 are prohibited from engaging in normal litigation activities, as well as from responding to routine  
9 email, correspondence and telephone communications. As a result, the SEC will be unable to meet  
10 the Court's deadlines while the SEC's counsel and staff are furloughed.

11 The SEC therefore asks the Court to extend the deadline for filing (i) the Order appointing  
12 Kathy Bazoian Phelps, Esq. as the successor receiver and the Diamond McCarthy law firm as the  
13 receiver's counsel and (ii) the Amended Joint Distribution Plan incorporating the Court's Order dated  
14 December 20, 2018 (ECF 443) for twenty-one days after the furlough of the SEC's counsel and staff  
15 has ended.

16 The SEC has advised other counsel that the furlough has gone into effect and that the SEC  
17 will be seeking an extension of filing deadlines during the furlough.

18 Dated: December 27, 2018

Respectfully submitted,

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20 /s/ John S. Yun

John S. Yun

21 Attorneys for the Plaintiff Securities and Exchange  
22 Commission  
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**ORDER EXTENDING FILING DEADLINES**

In light of the indefinite furlough of the SEC’s counsel and staff, and good cause appearing, the Court hereby extends all pending filing deadlines in this case until twenty-one days following the termination of the furlough.

SO ORDERED.

Dated: December \_\_\_\_, 2018

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EDWARD M. CHEN, Judge  
United States District Court