

1 ERIN E. SCHNEIDER (Cal Bar. No. 216114)
JOHN S. YUN (Cal. Bar No. 112260)
2 yunj@sec.gov
MARC D. KATZ (Cal. Bar No. 189534)
3 katzma@sec.gov

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

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 SECURITIES AND EXCHANGE COMMISSION,

12 Plaintiff,

13 v.

14 JOHN V. BIVONA; SADDLE RIVER
15 ADVISORS, LLC; SRA MANAGEMENT
ASSOCIATES, LLC; FRANK GREGORY
16 MAZZOLA,

17 Defendants, and

18 SRA I LLC; SRA II LLC; SRA III LLC;
FELIX INVESTMENTS, LLC; MICHELE J.
19 MAZZOLA; ANNE BIVONA; CLEAR
SAILING GROUP IV LLC; CLEAR
20 SAILING GROUP V LLC,

21 Relief Defendants.

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

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DEADLINES FOR FILING
REPLY PAPERS IN SUPPORT OF
OBJECTION TO MANAGEMENT FEE
CLAIMS (ECF 572) AND IN RESPONSE TO
MOTION FOR INSTRUCTIONS ON
INVESTOR ADVISORY COMMITTEE
(ECF 583)**

Date: May 13, 2020
Time: 10:00 a.m.
Courtroom: 5
Judge: Edward M. Chen

STIPULATION TO EXTEND FILING DEADLINES

In light of the continuation of the motion hearing in this proceeding from April 7, 2020 to May 13, 2020 and the logistical issues relating to the teleworking needs of some counsel, the parties to this Stipulation therefore request a one-week extension in the filing deadlines as follows:

Any reply papers in support of Plaintiff’s Objections to the Fee Claims Michele Mazzola and Joshua Cilano (ECF 572) and in response to Mr. Cilano’s opposition papers (ECF 590) shall now be due on Thursday, April 2, 2020.

Any opposition papers to the Receiver’s Motion for Instructions on the Investor Advisory Committee’s membership (ECF 583) shall now be due on Thursday, April 2, 2020, while any reply papers shall now be due on Thursday, April 9, 2020.

The hearing on these and other matters shall remain set for 10:00 a.m., on Wednesday, May 13, 2020.

Dated: March 24, 2020

Respectfully submitted,

/s/ John S. Yun
John S. Yun
Marc Katz
Attorneys for the Plaintiff Securities and Exchange
Commission

/s/ Esfand Nafisi
Esfand Nafisi
Migliaccio & Rathod LLP
388 Market Street, Suite 1300
San Francisco, CA 94111
Attorneys for Claimant Joshua Cilano

/s/ Kathy Bazoian Phelps
Diamond & McCarthy
1999 Avenue of the Stars, 11th Floor
Los Angeles, CA 90067
Court Appointed Receiver

/s/ Jonathan K. Levine
Jonathan K. Levine
Pritzker Levine LLP
1900 Powell Street, Suite 450
Emeryville, CA 94608
Attorneys for the SRA Funds Investor Group

1 /s/ Avi Israeli
2 Holwell Shuster & Goldberg LLP
3 425 Lexington Avenue
4 New York, New York 10017
5 Counsel for Progresso Ventures

6 **STIPULATED ORDER**

7 GOOD CAUSE APPEARING, the Court sets the following briefing schedule:


8 Any reply papers in support of Plaintiff's Objections to the Fee Claims Michele Mazzola and
9 Joshua Cilano (ECF 572) and in response to Mr. Cilano's opposition papers (ECF 590) shall now be
10 due on Thursday, April 2, 2020.

11 Any opposition papers to the Receiver's Motion for Instructions on the Investor Advisory
12 Committee's membership (ECF 583) shall now be due on Thursday, April 2, 2020, while any reply
13 papers shall now be due on Thursday, April 9, 2020.

14 The hearing on these matters and other matters shall remain set for 10:00 a.m., on
15 Wednesday, May 13, 2020.

16 SO ORDERED.

17 Dated: March 26, 2020

18 
19 EDWARD M. CHEN, Judge
20 United States District Court
21
22
23
24
25
26
27
28

1 ERIN E. SCHNIDER (Bar No. 216114)
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
Facsimile: (415) 705-2501
8
9

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

14 SECURITIES AND EXCHANGE COMMISSION,

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

15 Plaintiff,

CERTIFICATE OF SERVICE

16 v.

Date: February 28, 2019

Time: 10:30 a.m.

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

Courtroom: 5

Judge: Edward M. Chen

20 Defendants, and

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

24 Relief Defendants.
25
26
27
28