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5 *Successor Receiver*

6
7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10
11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 v.

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

17 Defendants, and

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

22 Relief Defendants.
23

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

**NOTICE OF ADMINISTRATIVE MOTION
BY RECEIVER KATHY BAZOIAN PHELPS
PURSUANT TO LOCAL CIVIL RULE 7-11
FOR ORDER AUTHORIZING EXECUTION
OF LOCK-UP AGREEMENT AND
APPROVING SALE OF SECURITIES
PURSUANT TO DISTRIBUTION PLAN**

Date: No Hearing Set
Time: No Hearing Set
Judge: Edward M. Chen

24
25 **TO ALL INTERESTED PARTIES:**

26 **PLEASE TAKE NOTICE THAT** under Local Civil Rule 7-11, Kathy Bazoian Phelps,
27 the successor receiver herein (the "Receiver") of SRA Management Associates, LLC, SRA I,
28 LLC, SRA II, LLC, SRA III, LLC, Clear Sailing Group IV, LLC, Clear Sailing Group V, LLC,

1 Felix Multi-Opportunity Fund I, LLC, Felix Multi-Opportunity Fund II, LLC, Felix Management
2 Associates, LLC, NYPA Fund I, LLC, NYPA Fund II, LLC, NYPA Management Associates,
3 LLC and Solis Associates Fund LLC, hereby files this Motion for Order Authorizing Execution of
4 Lockup Agreement and Approving Sale of Securities Pursuant to Distribution Plan.

5 The Motion seeks authority to sign a Lock-Up Agreement with Palantir Technologies, Inc.
6 that will allow for the sale of 20% of the Palantir shares held by the receivership estate, with the
7 remainder to be held pending expiration of the lock-up period. The Motion also seeks authority to
8 sell no more than 1,000,000 of the Palantir shares held by the estate at a price of not less than \$10
9 per share in order to satisfy the obligations under the Court-approved Distribution Plan to fund the
10 Plan Fund and pay all associated taxes and commissions in connection with that sale.
11 Distributions of securities to investors holding an interest in Palantir shares will be made upon
12 expiration of the lock-up period and will be subject to approval by the Court in a separate motion
13 to be filed closer to the time of distribution.

14 The Motion is based upon this Notice of Motion, the Motion, the Declaration of the
15 Receiver, and the proposed order. In addition to service by ECF, the Receiver intends to serve this
16 Notice, the Motion and the supporting documents on all interested parties using a confidential
17 email list, and to post this Notice, the Motion and supporting documents on the Receivership
18 website. *See* Civil L.R. 66-6.

19 **PLEASE TAKE FURTHER NOTICE THAT** any opposition to the Motion must be filed
20 within four days of the filing of the Motion. *See* Civil Local Rule 7-11.

21
22 Respectfully submitted,

23 DATED: September 4, 2020

By: /s/ Kathy Bazoian Phelps
Kathy Bazoian Phelps
Receiver