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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiffs,

v.

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

Defendants, and

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

Relief Defendants.

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

**[PROPOSED] ORDER
APPROVING TWENTY-FOURTH
INTERIM ADMINISTRATIVE
MOTION FOR AN ORDER
PURSUANT TO LOCAL RULE
7-11 FOR THE APPROVAL OF
FEES AND EXPENSES FOR THE
SUCCESSOR RECEIVER, RAINES
FELDMAN LITTRELL LLP,
MILLER KAPLAN ARASE LLP,
AND SCHINNER & SHAIN, LLP
FROM OCTOBER 1, 2024
THROUGH DECEMBER 31, 2024**

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

1 The successor receiver in this matter appointed pursuant to the Court’s Revised Order
2 Appointing Receiver (the “Receiver Order”) (Dkt. No. 469), Kathy Bazoian Phelps (the
3 “Receiver”), requests that the Court grant the *Twenty-Fourth Interim Administrative Motion*
4 *for an Order Pursuant to Local Rule 7-11 for the Approval of Fees and Expenses for the*
5 *Successor Receiver, Raines Feldman Littrell LLP, Miller Kaplan Arase LLP, and Schinner &*
6 *Shain LLP for the period of October 1, 2024 through December 31, 2024* (“Motion”).

7 The Motion is supported by the Declaration of the Receiver, in which she states that
8 the fees and expenses requested by the Receiver and the firm Raines Feldman Littrell LLP
9 (“Raines Feldman”), general counsel for the Receiver, are true and correct, the Motion
10 complies with the Billing Instructions for Receivers in Civil Actions Commenced by the U.S.
11 Securities and Exchange Commission, and that that the fees charged are reasonable,
12 necessary, and commensurate with the skills and experience required for the activities
13 performed.

14 The Motion is supported by the Declaration of Nicholas Sanchez of Miller Kaplan
15 Arase LLP (“Miller Kaplan”), tax advisors for the Receiver, in which he states that the fees
16 and expenses requested are true and correct, and the fees charged are reasonable, necessary,
17 and commensurate with the skill and experience required.

18 The Motion is also supported by the Declaration of Frederick Koenen of Schinner &
19 Shain LLP (“Schinner”), securities counsel for the Receiver, in which he states that the fees
20 and expenses requested are true and correct, and the fees charged are reasonable, necessary,
21 and commensurate with the skill and experience required.

22 The Receiver has also represented that she has conferred with counsel for the
23 Securities and Exchange Commission, who has confirmed that it does not oppose the Motion.

24 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that:

- 25 1. The Motion is GRANTED;
- 26 2. The Receiver’s fees in the amount of \$34,921.50 for services rendered from
27 October 1, 2024 through December 31, 2024 (the “Motion Period”) are approved. The
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1 Receiver is authorized to pay from assets of the receivership estate \$27,937.20 of the fees
2 approved. The sum of \$6,984.30 of the approved fees shall be held back as the agreed 20%
3 hold back subject to further Court approval.

4 3. Raines Feldman’s fees in the amount of \$37,988.10 for services rendered and
5 \$10.20 for costs during the Motion Period are approved, and the Receiver is authorized to
6 pay from assets of the receivership estate \$37,988.10 for the fees and \$10.20 for the costs
7 approved.

8 4. Miller Kaplan’s fees in the amount of \$2,899.60 for services rendered during
9 the Motion Period are approved. The Receiver is authorized to pay from the assets of the
10 receivership estate \$2,899.60 for the fees approved.

11 5. Schinner’s fees in the amount of \$3,402.00 for services rendered during the
12 Motion Period are approved. The Receiver is authorized to pay from the assets of the
13 receivership estate \$3,402.00 for the fees approved.

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16 Dated: _____

Honorable Edward M. Chen
United States District Court

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