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

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiffs,

14 v.

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

17 Defendants, and

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

21 Relief Defendants.
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Case No.: 3:16-cv-01386-EMC

**[PROPOSED] ORDER
APPROVING ADMINISTRATIVE
MOTION PURSUANT TO LOCAL
RULE 7-11 FOR ORDER
APPROVING:**

- (1) EMPLOYMENT OF
MADDEN LAW LLC AS
SPECIAL COUNSEL; AND**
- (2) MODIFICATION OF
EMPLOYMENT OF
STRETTO, AS CLAIMS
AGENT**

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 *Administrative Motion Pursuant to Local Rule*
4 *7-11 for an Order Approving (1) Employment of Madden Law LLC, as Special Counsel and*
5 *(2) Modification of Employment of Stretto, as Claims Agent* (“Motion”).

6 The Motion is supported by the Declaration of the Receiver.

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

9 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that:

- 10 1. The Motion is GRANTED;
- 11 2. The Receiver is authorized, effective retroactively to April 8, 2025, to employ
12 David Madden of Madden Law LLC as her special counsel on the terms set forth in the
13 Motion.
- 14 3. The Receiver is authorized to modify the employment of Stretto as her claims
15 administrator at the rates set forth in the Motion and in Exhibit 2 to the Declaration of the
16 Receiver.
- 17 4. The Service Agreement with Stretto attached to the Declaration of the
18 Receiver as Exhibit 3 is approved.

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21 Dated: _____

Honorable Edward M. Chen
United States District Court