

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

Case No: 8:19-cv-886-T-33SPF

OASIS INTERNATIONL GROUP,  
LIMITED; OASIS MANAGEMENT, LLC;  
SATELLITE HOLDINGS COMPANY;  
MICHAEL J. DACORTA; JOSEPH S.  
ANILE, II; RAYMOND P. MONTIE, III;  
FRANCISCO "FRANK" L. DURAN; and  
JOHN J. HAAS,

Defendants;

and

MAINSTREAM FUND SERVICES, INC.;  
BOWLING GREEN CAPITAL  
MANAGEMENT LLC; LAGOON  
INVESTMENTS, INC.; ROAR OF THE  
LION FITNESS, LLC; 444 GULF OF  
MEXICO DRIVE, LLC; 6922 LACANTERA  
CIRCLE, LLC; 13318 LOST KEY PLACE,  
LLC; and 4OAKS LLC,

Relief Defendants.

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**RELIEF DEFENDANT MAINSTREAM FUND SERVICES, INC.  
MOTION TO CONTINUE PRELIMINARY INJUNCTION HEARING**

COMES NOW, Relief Defendant Mainstream Fund Services, Inc. (hereinafter "Mainstream") and hereby request a thirty (30) day continuance of the preliminary injunction hearing in this matter, currently scheduled for April 29, 2019, at 1:00 p.m.

## FACTUAL AND PROCEDURAL HISTORY

1. On or about April 15, 2019, Plaintiff Commodity Futures Trading Commission (hereinafter “Plaintiff”), filed an Emergency *Ex Parte* Motion for a Statutory Restraining Order, Preliminary Injunction, and Other Equitable Relief and Memorandum in Support (hereinafter “Emergency Motion”) pursuant to 7 U.S.C. § 13a-1(a) of the Commodity Exchange Act, against the Defendants. Dkt. 4.

2. On April 15, 2019, this Court granted Plaintiff’s Emergency Motion for an *ex parte* statutory restraining order and appointed a temporary receiver. Dkt. 7.

3. The Court set a hearing on Plaintiff’s Emergency Motion for April 29, 2019, at 1:00 p.m. Dkt. 9.

4. On April 18, 2019, Mainstream was served with a copy of the Order granting Plaintiff’s Emergency Motion.

5. On April 29, 2019, the undersigned, Christopher A. Walker entered an appearance on behalf of Mainstream in the instant case.

6. On April 24, 2019, Mainstream entered into an oral agreement with Plaintiff and the Receiver regarding the transfer of Oasis funds held by Mainstream. Thereafter, Citibank was directed by Mainstream to wire the funds directly to the Receiver. Pursuant to this oral agreement, Plaintiff and the Receiver also agreed to unfreeze two other accounts, which do not hold Oasis funds.

7. The undersigned counsel have recently been retained by Mainstream and require additional time to finalize the oral agreement and other anticipated items of cooperation.

8. On April 26, 2019, Mr. Vacco corresponded with Plaintiff’s counsel Jo Mettenburg, Esq., and Jennifer Chapin, Esq., regarding Mainstream’s request for a continuance of the

Preliminary Injunction hearing. Plaintiff's counsel stated that they will not oppose the request for a continuance.

9. Mainstream has no objection to the proposed Order Appointing Receiver and Staying Litigation.

WHEREFORE, Relief Defendant Mainstream Fund Services, Inc. respectfully requests a thirty (30) day continuance of the Preliminary Injunction hearing scheduled for April 29, 2019, and grant any other relief that the Court deems appropriate.

Respectfully submitted,

s/ Christopher A. Walker  
Christopher A. Walker  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 29, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to the Commodity Futures Trading Commission, 4900 Main Street, Kansas City, Missouri 64112, to J. Allison Auxter at [jaauxter@cftc.gov](mailto:jaauxter@cftc.gov), Jennifer Chapin at [jchapin@cftc.gov](mailto:jchapin@cftc.gov), to Jo Mettenburg at [jmettenburg@cftc.gov](mailto:jmettenburg@cftc.gov), Burton W. Wiand, Wiand Guerra, PL, 5505 West Gray Street, Tampa, Florida 33609 at [bwiand@wiandlaw.com](mailto:bwiand@wiandlaw.com).

Lippes Mathias Wexler Friedman LLP

By: s/Christopher A. Walker  
Christopher A. Walker, Esq.