

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

CASE NO.: 8:19-CV-00886-VMC-SPF

v.

OASIS INTERNATIONAL 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; 4064 FOUNDERS
CLUB DRIVE, LLC; 6922 LACANTERA
CIRCLE, LLC; 13318 LOST KEY PLACE,
LLC; AND 4OAKS, LLC,

Relief Defendants.

**DEFENDANT, MICHAEL J. DACORTA'S UNOPPOSED MOTION FOR
EXTENSION OF TIME**

COMES NOW Defendant, MICHAEL J. DACORTA (hereinafter referred to as
"Defendant"), by and through the undersigned counsel, pursuant to Rule 6(b), *Fed. R. Civ.*

Pro., moves this Honorable Court for an Order to extend time to file an answer, or otherwise pled in this action, until June 22, 2019. In support thereof, Defendant states the following:

FACTS AND PROCEDURAL HISTORY

1. The Commodity Futures Trading Commission (hereinafter referred to as “Plaintiff”) filed a Complaint on April 15, 2019.
2. The Complaint was served upon Defendant on April 18, 2019. The time for filing an Answer or other pleading would have expired on May 10, 2019.
3. Defendant formally retained the undersigned on May 22, 2019.
4. The undersigned have conferred with counsel for Plaintiff, the temporary receiver, and others to preserve all information that is related to the allegations in the Complaint, defenses to the allegations in the Complaint.
5. This Motion is not being made for purposes of delay. The additional time is necessary to prepare an Answer or other pleading, if more appropriate.

LAW AND ARGUMENT

6. Rule 6(b), *Fed. R. Civ. Pro.*, permits this Honorable Court to extend the time to file an Answer or other pleadings, if more appropriate, for good cause shown. Since being retained, the undersigned have been working diligently to respond to Plaintiff and the temporary receiver, but additional time is necessary to file an Answer or other pleading, if appropriate. The undersigned would submit that good cause has been shown and requests this Honorable Court extend the date to file an Answer or other responsive pleading to June 22, 2019.

RULE 3.01(G), *FED. R. CIV. PRO.*, CERTIFICATION

7. On May 22, 2019, Jo Mettenburg, Chief Trial Attorney for Plaintiff, authorized the undersigned to represent to this Honorable Court that Plaintiff does not oppose the relief requested herein.

WHEREFORE, Defendant respectfully requests this Honorable Court extend time to file an Answer or otherwise plead in this action until June 22, 2019.

DATED on May 22, 2019.

/S/ Jacob V. Stuart, Jr.
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Trial Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been electronically filed with the Clerk of Court via the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record who have appeared in the case to date.

/S/ Jacob V. Stuart, Jr.
Jacob V. Stuart, Jr., Esquire
Florida Bar No.: 0086977

THE LAW OFFICE OF JACOB V. STUART, P.A.

/S/ Christopher R. Kaigle
Christopher R. Kaigle, Esquire
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THE KAIGLE LAW FIRM, P.A.