

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

BURTON W. WIAND, not  
individually  
but solely in his capacity as Receiver  
for OASIS INTERNATIONAL  
GROUP, LIMITED, et al.,

Plaintiffs,

v.

ATC BROKERS LTD., DAVID  
MANOUKIAN, and SPOTEX  
LLC,

Defendants.

No. 21-cv-1317

**UNOPPOSED JOINT MOTION TO EXTEND DEADLINES  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and the Court's inherent authority to control its docket, Defendants ATC Brokers Ltd., David Manoukian, and Spotex LLC move to extend their deadline for responding to Plaintiff's Complaint (Dkt. 1) by two weeks to **August 9, 2021** for ATC Brokers Ltd. and Mr. Manoukian and **August 20, 2021** for Spotex. Plaintiff does not oppose the requested extensions of time.

Plaintiff has brought this action in connection with the CFTC's litigation against alleged Ponzi scheme participants—the Oasis entities—in *CFTC v. Oasis*

*International Group Ltd.* Case No. 8:19-cv-886-T-33SPF (M.D. Fla.). ATC Brokers Ltd., David Manoukian, and Spotex are non-parties in that action.

The current response deadline for ATC Brokers Ltd. and Mr. Manoukian is July 26. Dkt. 17. The deadline for Spotex is August 6. Dkts. 11 and 12. As these deadlines have not yet passed, Rule 6(b)(1)(A) affords this Court discretion to extend it “for good cause.” Discretionary extensions “should be liberally granted absent a showing of bad faith . . . or undue prejudice.” *Lizarazo v. Miami-Dade Corr. & Rehab. Dep’t*, 878 F.3d 1008, 1012 (11th Cir. 2017) (quoting *United States v. Miller Bros. Const. Co.*, 505 F.2d 1031, 1035 (10th Cir. 1974)).

Good cause exists here to facilitate the ongoing discussions between Plaintiff and Defendants. The parties held a substantive and productive 3.01(g) conference on July 21, 2021, to discuss ATC Brokers Ltd., David Manoukian, and Spotex’s planned Motions to Dismiss. Although the parties did not reach agreement, ATC Brokers Ltd., David Manoukian, and Spotex agreed to provide additional information regarding their positions to the Receiver before any filings in an effort to narrow the issues and conserve resources.

Dated: July 26, 2021

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Respectfully submitted,

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*Counsel for ATC Brokers Ltd. and David  
Manoukian*

**RULE 3.01(g) CERTIFICATION**

The undersigned certifies that he conferred with Plaintiff's counsel, who does not oppose the requested relief.

/s/ Christopher Torres  
Attorney

**CERTIFICATE OF SERVICE**

I certify that on July 26, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Christopher Torres  
Attorney