

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

**CASE NO. 8:21-cv-01317-MSS-ASS**

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

Plaintiff,

v.

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

Defendants.

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**RECEIVER'S UNOPPOSED MOTION FOR LEAVE TO EXCEED  
PAGE LIMITATION FOR RESPONDING TO DEFENDANT DAVID  
MANOUKIAN'S MOTION TO DISMISS AMENDED COMPLAINT**

Plaintiff Burton W. Wiand, not individually but solely in his capacity as the Court-appointed receiver (the “Receiver”) over Oasis International Group, Limited (“OIG”), Oasis Management, LLC (“OM”), Satellite Holdings Company (“Satellite Holdings”), and their affiliates and subsidiaries, hereby moves, on an unopposed basis, for leave to exceed the 20-page limitation for his Opposition Memorandum to Defendant David Manoukian’s (“Manoukian”) Motion to Dismiss (DE 42), and states:

1. On September 24, 2021, the Receiver filed his Amended Complaint (DE 36) against Defendants ATC Brokers Ltd. (“ATC”), Manoukian and Spotex LLC (“Spotex”) (collectively, “Defendants”).

2. On October 22, 2021, all three Defendants filed their respective Motions to Dismiss (DE 41-43).

3. The current response deadline for all three Motions to Dismiss is December 13, 2021, based on the recent extension graciously granted by the Court (DE 44-45).

4. The Receiver will be responding to the Manoukian and Spotex Motions on the upcoming December 13<sup>th</sup> deadline, and will be seeking an additional extension regarding responding to the ATC Motion in a concurrent, separate motion.

5. The Receiver’s Opposition Memorandum to Manoukian’s 25-page Motion is 22 pages in substance, and thus exceeds the page limitation for opposition memorandum by only 2 pages.

6. Manoukian's 25-page Motion raises many arguments in response to the Receiver's nearly 60-page Amended Complaint, and naturally the Receiver's Opposition Memorandum must address these critical and complex issues thoroughly and completely. Therefore, these circumstances necessitate exceeding the 20-page limitation, which the Receiver will limit to an additional 2 pages for a total length of 22 pages of substance.

7. Counsel for Manoukian has graciously consented to the requested pages.

#### **MEMORANDUM OF LAW**

Local Rule 3.01(b) provides that opposition memorandum should have a limitation of 20 pages. However, a District Court has the discretion to permit deviation from its Local Rules. *Am. Farm Lines v. Black Ball Freight Serv.*, 397 U.S. 532, 539 (1970); *Brown Express, Inc. v. United States*, 607 F.2d 695, 703 (5<sup>th</sup> Cir. 1979). The Receiver respectfully submits that this Motion is filed in good faith and for good cause based on the above circumstances.

WHEREFORE, the Receiver respectfully requests that this Court grant this Motion and permit the Receiver to file an Opposition Memorandum to Manoukian's Motion to Dismiss that is no more than 22 pages of substance.

December 9, 2021

Respectfully submitted,

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**RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), the Receiver hereby certifies that he has conferred with Manoukian's counsel, who does not oppose the requested relief.

/s/Patrick J. Rengstl  
**Patrick J. Rengstl, Esq.**

**CERTIFICATE OF SERVICE**

I certify that on December 9, 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/Patrick J. Rengstl  
**Patrick J. Rengstl, Esq.**