

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

BURTON W. WIAND, as Receiver for
OASIS INTERNATIONAL GROUP,
LTD.; OASIS MANAGEMENT, LLC;
AND SATELLITE HOLDINGS
COMPANY,

Plaintiff,

Case No.: 8:20-cv-863-T-60SPF

v.

RAYMOND P. MONTIE, III,

Defendant.

**RECEIVER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO SERVE EXPERT DISCLOSURES**

Burton W. Wiand, as receiver for the plaintiff entities (the “**Receiver**”), moves the Court for a further 7-day extension of the parties’ deadlines to serve expert disclosures. On March 2, 2021, the parties moved the Court to extend their expert disclosure deadlines by 14 days from March 1 and 11, 2021, respectively, to March 15 and 25, 2021, respectively. Doc. 52. The Court granted that motion the same day. Doc. 53. The parties now seek to extend the deadlines by an additional 7 days to March 22 and April 1, 2021.

The Receiver currently plans to disclose the expert report prepared by his forensic accountants, KapilaMukamal, LLP (“**Kapila**”), on March 15,

2021 (*i.e.*, the existing deadline) to ensure this matter progresses toward trial with minimum, if any, delay. That report will explain the operation of the Oasis Ponzi scheme and serve as the Receiver's principal expert evidence. In addition, the Honorable Virginia Hernandez Covington, who appointed the Receiver and supervises the Receivership in a related CFTC enforcement action (the "**Appointing Court**"), has already approved the Receiver's retention of Kapila. As such, there are likely no barriers to the Receiver's disclosure of Kapila and their report on March 15, 2021.

The Oasis scheme, however, had many international components, and the Receiver plans to retain a second expert to address related matters. That expert will likely be from the Cayman Islands. The Receiver intends to use the additional, extended time to finalize the engagement of that expert and the expert's report. These matters are complicated by various international issues. The Receiver also plans use the time to draft and file a motion seeking approval of the engagement from the Appointing Court. Such approval is arguably required by the pertinent order governing the Receiver's mandate, but even under a more flexible interpretation, the Receiver nevertheless believes he should obtain the Appointing Court's approval in an abundance of caution and to promote the transparency of Receivership expenditures.

As a matter of proportionality, the Receiver and the defendant also seek to extend the defendant's expert disclosure deadline by an equal amount of time. The requested extension will neither affect any other deadline in this case nor prejudice either party. For example, the discovery cut-off in this case is not until June 30, 2021, and trial is scheduled for the January 2022 term. The extension will not cause the continuance of any pretrial conference, hearing, or trial in contravention of paragraph 3 of the Case Management and Scheduling Order.

Federal Rule of Civil Procedure 6(b) empowers this Court to grant requests for extensions of time. The 7-day extension is limited in length and does not evince any delay in the progress of this case to trial. Rather, the additional time is needed so that the Receiver can adequately prepare his second expert report and file a motion to approve the retention of the expert with the Appointing Court. The defendant should be afforded an equal amount of additional time. Therefore, the Receiver respectfully requests that the Court grant the extension.

LOCAL RULE 3.01(g) CERTIFICATION

Counsel for the Receiver has conferred with counsel for the defendant, who does not oppose the extension of the Receiver's deadline and requests a similar extension of the defendant's deadline.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 11, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/ Jared J. Perez

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