

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

COMMODITY FUTURES TRADING
COMMISSION,

Case No. 8:19-CV-886-T-33SPF

Plaintiff,

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

FUNDADMINISTRATION, 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 4 OAKS LLC,

Relief Defendants.

**RECEIVER'S MOTION FOR EXTENSION OF DEADLINE TO
FILE RECEIVER'S TWENTIETH INTERIM MOTION FOR
ORDER AWARDING FEES AND COSTS**

Burton W. Wiand, as Receiver (the “**Receiver**”), respectfully moves the Court to extend the deadline for filing the Receiver’s Twentieth Interim Motion for Order Awarding Fees and Costs (the “**Motion for Fees**”). In support thereof, the Receiver states as follows:

1. On May 1, 2024, the Receiver filed his Twentieth Interim Report (Doc. 813), which detailed extensive activities in the Receivership between January 1, 2024 through March 31, 2024.

2. Pursuant to the Court’s Consolidated Receivership Order (Doc. 177), the Receiver must apply to the Court for compensation and expense reimbursement within 45 days after the end of each calendar quarter — here, May 15, 2024. (Doc. 177 at 23 ¶ 60.)

3. As detailed in the latest Interim Report (Doc. 813 at 1-2), throughout the current reporting period, the Receiver and his professionals have: (a) preserved fraudulent transfer claims against ATC Brokers Ltd., David Manoukian, and Spotex, LLC, worth more than **\$20 million**, by participating in oral argument before and obtaining an order from the United States Court of Appeals for the Eleventh Circuit reversing, vacating, and remanding a lower court’s dismissal with prejudice of the Receiver’s lawsuit against those parties; (b) obtained court approval to distribute \$9 million to claimants;¹ (c) continued its investigation of a possible recovery scam targeting investor victims and filed

¹ Distribution checks were mailed to claimants on April 30, 2024.

with the Court the Supplemental Interim Report Regarding the Continuing Obstruction of the Receivership and Possible Recovery Scam Targeting Investors (see Doc. 811); (c) collected litigation income of **\$194,036.05** through settlements and/or the enforcement of default judgments; and (d) collected **\$79,680.04** in interest income on seized funds.

4. The Receiver desires that his motion for fees and costs be as complete as possible, and given the tasks identified above, as well as ongoing claims-related tasks, he requests an extension to finalize the submission.

5. The Receiver believes that an additional two weeks will allow adequate time to review the proposed fee motion and all attachments and confer with all parties as required by Local Rule 3.01(g).

6. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court may for good cause extend a deadline if a request is made before the deadline.

7. The Receiver submits that good cause exists for a two-week extension. This motion is not made for purposes of delay, and the relief requested will not prejudice any party.

WHEREFORE, the Receiver respectfully requests a two-week extension of the deadline for filing the Receiver's Twentieth Interim Motion for Order Awarding Fees and Costs, from May 15, 2024 to May 29, 2024.

LOCAL RULE 3.01(g) CERTIFICATION

Undersigned counsel for the Receiver has conferred with counsel for the CFTC and is authorized to represent to the Court that the CFTC does not oppose the relief requested in this motion. Defendant DaCorta (who is appealing the Court's entry of summary judgment against him) has no objection. The Receiver has not consulted with defendants Anile, Duran, Haas, and Montie because they have either defaulted or settled the CFTC's claims against them through the entry of consent orders and judgments and are thus no longer active participants in this litigation. The undersigned has not consulted with the intervening party United States because the government has not previously taken a position on the Receiver's fee applications and the stay it earlier obtained expired on July 24, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 14, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I have also provided the following non-CM/ECF participants with a true and correct copy of the foregoing by electronic mail to:

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