

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-CIV-21964-CMA

SECURITIES AND EXCHANGE
COMMISSION,
Plaintiff,

v.

TCA FUND MANAGEMENT GROUP CORP.,
et al.,

Defendants.

/

**RECEIVER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE LIQUIDATION PLAN**

COMES NOW, Jonathan E. Perlman, Esq., Court-Appointed Receiver (“Receiver”) of the Receivership Entities,¹ by and through undersigned counsel hereby files this Unopposed Motion for Extension of Time to File Liquidation Plan (“Motion”) and accordingly states as follows:

1. On May 11, 2020, the Securities and Exchange Commission (“SEC”) filed its Complaint for Injunctive Relief against TCA Fund Management Group, Corp. (“FMGC”), TCA Global Credit Fund GP, LTD. (“GP”), (“Receivership Defendants”), and TCA Global Credit Fund, LP (“Feeder LP”), TCA Global Credit Fund, LTD. (“Feeder Ltd.”), and TCA Global Credit Master Fund, LP (“Master Fund”) (“Relief Defendants”) (collectively, “Defendants”). [ECF No. 1].

2. The SEC also filed an Expedited Motion for Appointment of Receiver. [ECF No. 3].

3. On the same day, the Court granted the motion and appointed Jonathan E. Perlman, Esq., of the law firm Genovese Joblove & Battista, P.A. (“GJB”), as permanent Receiver over the

¹ All terms not specifically defined herein have the meaning ascribed to them in the SEC’s Motion for Appointment of Receiver [ECF No. 3] and the Court’s Appointment Order [ECF No. 5], and the Court’s First Expansion Order [ECF No. 16].

Receivership Entities [ECF No. 5] (“Appointment Order”).

4. Pursuant to the Appointment Order, the Receiver “is authorized, empowered and directed to develop a plan for the fair, reasonable, and efficient recovery and liquidation of all remaining, recovered, and recoverable Receivership Property (the “Liquidation Plan”).” *Id.* at § XIII ¶ 46.

5. The Appointment Order required the Receiver to file the Liquidation Plan in this case on or before August 7, 2020. *Id.* at ¶ 47.

6. Due to the amount and varied nature of the Receivership Properties, the Receiver requires additional time to prepare a liquidation plan for the Receivership Estate.

7. Accordingly, the Receiver requests an extension of this deadline by an additional 90 days and asks that the Liquidation Plan be due on or before November 5, 2020. The Receiver has conferred with the SEC who has no objection to this request.

WHEREFORE, Receiver, Jonathan E. Perlman, by and through his undersigned counsel respectfully requests that this Honorable Court grant the Motion and extend the deadline to file the Liquidation Plan by 90 days. A proposed order for the Court’s consideration is attached as Exhibit A.

S.D. Fla. L.R. 7.1(A)(3) CERTIFICATE OF CONFERENCE

I, Irina Sadovnic, Esq., hereby certify that counsel for the Receiver conferred with counsel for the SEC on July 14, 2020, via phone and email regarding the requested relief and is authorized to represent that the SEC has no objection to the relief sought.

GENOVESE JOBLOVE & BATTISTA, P.A.
Attorneys for Jonathan E. Perlman, Receiver
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By: /s/ Irina R. Sadovnic
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served via CM/ECF Notification and/or U.S. Mail to all parties and notification of such filing to all CM/ECF participants in this case on the 27th day of July, 2020.

By: /s/ Irina R. Sadovnic
Irina R. Sadovnic, Esq.

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SECURITIES AND EXCHANGE
COMMISSION,

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TCA FUND MANAGEMENT GROUP CORP.,
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Defendants.

**[PROPOSED] ORDER GRANTING RECEIVER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE LIQUIDATION PLAN**

THIS CAUSE, having come before the Court upon Jonathan E. Perlman, as Court-Appointed Receiver's ("Receiver") Unopposed Motion for Extension of Time to File Liquidation Plan ("Motion") [ECF No. __]. The Court has considered the Motion and is otherwise duly advised in the premises. Accordingly, it is ORDERED AND ADJUDGED that:

The Motion is GRANTED. The Receiver shall file the Liquidation Plan on or before November 5, 2020.

DONE AND ORDERED, in chambers at Miami, Florida, this __ day of July, 2020.

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE
DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF FLORIDA