

**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 QUARTERLY STATUS REPORT**

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 Quarterly Status Report (“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,

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].

Esq., of the law firm Genovese Joblove & Battista, P.A. (“GJB”), as permanent Receiver over the Receivership Entities [ECF No. 5] (“Appointment Order”).

4. Pursuant to the Appointment Order, “the Receiver shall file and serve a full report and accounting of each Receivership Estate (the “Quarterly Status Report”), reflecting (to the best of the Receiver’s knowledge as of the period covered by the report) the existence, value, and location of all Receivership Property, and of the extent of liabilities, both those claimed to exist by others and those the Receiver believes to be legal obligations of the Receivership Estates.” *Id.* at § XIII ¶ 48.

5. The Appointment Order required the Receiver to file the Quarterly Status Report “within thirty (30) days after the end of each calendar quarter,” the first one being due on or before July 30, 2020. *Id.*

6. The Receiver requires additional time to finalize the first Quarterly Status Report.

7. Accordingly, the Receiver requests a brief extension 5-day of this deadline and asks that the Quarterly Status Report be due on or before August 4, 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 Quarterly Status Report by 5 days, and file on or before Wednesday February 3, 2021. 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 January 29, 2021, via email regarding the requested relief and is authorized to represent that the SEC has no objection to the relief sought.

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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 29th day of January, 2021.

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

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SECURITIES AND EXCHANGE
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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 QUARTERLY STATUS REPORT**

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 Quarterly Status Report ("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 Third Quarterly Status Report on or before February 3, 2021.

DONE AND ORDERED, in chambers at Miami, Florida, this ___ day of January, 2021.

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