

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 20-cv-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP, CORP., a Florida  
company, et al.,

Defendants.

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

COMES NOW, Jonathan E. Perlman, Esq., as court-appointed Receiver ("Receiver") of the Receivership Entities,<sup>1</sup> by and through undersigned counsel, hereby files this Fourth 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].

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<sup>1</sup> 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].

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 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. The Receiver sought and received prior extensions of time to file the Liquidation Plan through and including June 15, 2021. *See* [ECF Nos. 44, 69, 107].

7. In the time since the last extension, the Receiver and his professionals engaged in an extensive data collection and analysis project to compile and reconstruct the full investor database. *See* Motion to Compel Financial Institutions to Disclose the Investment Details of Beneficial Owners (“Motion to Compel”) [ECF No. 118] and Order Granting the Motion to Compel [ECF No. 119]. These efforts have allowed the Receiver to gain critical insight, past the nominee financial institutions and, to the identification of hundreds of individual investors which will assist in the ultimate distribution plan and liquidation plan.

8. Because of the nature and difficulty of communications with the institutions, nearly all of which are located in foreign jurisdictions around the world, this project remains ongoing.

9. Accordingly, the Receiver requires additional time to prepare the Liquidation Plan past the current June 15, 2021 deadline.

10. The additional time will allow the Receiver’s forensic accountants to review the extensive data produced by the fund administrator and the dozens of nominees as well as the

investors that have provided their information directly instead of through their nominees.

11. Counsel for the Receiver has conferred with the counsel for the SEC, who has no objection to this relief sought herein.

12. Accordingly, the Receiver requests an extension of time through and including November 1, 2021 to file the Liquidation Plan.

WHEREFORE, Receiver, Jonathan E. Perlman, by and through his undersigned counsel, respectfully requests that this Honorable Court grant him an extension of time to file the Liquidation Plan through and including November 1, 2021, and for such other relief as this Court deems just and proper.

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

Undersigned counsel hereby certifies that he conferred with counsel for the SEC on June 11 2021, via email regarding the requested relief and is authorized to represent that the SEC has no objection to the relief sought herein.

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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 11th day of June, 2021.

/s/ Irina R. Sadovnic \_\_\_\_\_  
Attorney

**SERVICE LIST**

*Securities and Exchange Commission v. TCA Fund Management Group Corp., et al.*  
**Case No. 20-Civ-21964-CMA**

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**ORDER**

THIS CAUSE came before the Court upon Receiver, Jonathan E. Perlman's Fourth Unopposed Motion for Extension of Time to File Liquidation Plan (the "Motion"). Being fully advised, it is hereby

ORDERED AND ADJUDGED that the Motion is GRANTED. The Receiver shall file the Liquidation Plan on or before November 1, 2021.

DONE AND ORDERED in Miami, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2021.

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CECILIA M. ALTONAGA  
UNITED STATES DISTRICT JUDGE

*cc: Counsel of Record*