

**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 FIFTH QUARTERLY STATUS REPORT**

Jonathan E. Perlman, Esq., court-appointed Receiver (the “Receiver”) of the Receivership Entities,¹ by and through undersigned counsel, hereby files this Unopposed Motion for Extension of Time to File Fifth Quarterly Status Report (“Motion”) and 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., 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 requires the Receiver to file the Quarterly Status Report “within thirty (30) days after the end of each calendar quarter,” the fifth one being due on or before July 30, 2021. *Id.*

6. The Receiver and his counsel have been diligently working to prepare the Fifth Quarterly Status Report, but due to the Receiver and undersigned counsels’ schedule in related matters, the Receiver and counsel have not had sufficient time to finalize the Fifth Quarterly Status Report for submission.

7. Accordingly, the Receiver requests an additional brief extension through and including August 6, 2021, to file the Receiver’s Fifth Quarterly Status Report.

8. The Receiver seeks this extension in good faith and not for the purposes of delay.

9. Counsel for the Receiver conferred with the SEC who has no objection to the requested relief.

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 Receiver’s Fifth Quarterly Status Report through and including August 6, 2021, and for such

other relief this Court deems just and proper.

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

Undersigned counsel hereby certifies that counsel for the Receiver, Irina Sadovnic, conferred with counsel for the SEC, Stephanie Moot, on July 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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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 July, 2021.

/s/ Irina R. Sadovnic

Attorney

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**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE FIFTH QUARTERLY STATUS REPORT**

THIS CAUSE, having come before the Court upon Jonathan E. Perlman's, as court-appointed receiver (the "Receiver"), Unopposed Motion for Extension of Time to File Fifth Quarterly Status Report ("Motion"). 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 fifth Quarterly Status Report on or before August 6, 2021.

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

CECILIA M. ALTONAGA
UNITED STATES DISTRICT JUDGE

cc: counsel of record