UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 0:17-60907-CIV-MORENO

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

JEREMY LEE MARCUS, *et al.*,

Defendants.

_____/

RECEIVER'S MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO REPORT AND RECOMMENDATION

Jonathan E. Perlman, Esq., court-appointed Receiver (the "Receiver"), hereby files his Motion for Extension of Time to File Objections to the January 8, 2025 Report and Recommendation on Receiver's Final Motion for Award of Professional Fees and Reimbursement of Expenses [DE 593], and in support thereof, states as follows:

1. On October 8, 2024, the Receiver filed his Final Motion for Award of Professional Fees and Reimbursement of Expenses (the "Final Motion"). [ECF No. 585].

2. On November 21, 2024, this Court issued an Order of Referral to Magistrate Judge Ellen F. D'Angelo Regarding Receiver's Final Motion for Award of Professional Fees and Reimbursement of Expenses. [DE 586]. Thereafter, this Court issues an Order Vacating Referral to Magistrate Judge Ellen F. D'Angelo and Referring Receiver's Motion for Award of Professional Fees and Reimbursement of Expenses to Magistrate Judge Panayotta Augustin-Birch. [DE 587].

3. On January 8, 2025, the Report and Recommendation on Receiver's Final Motion for Award of Professional Fees and Reimbursement of Expenses was issued by Judge Augustin-

Birch (the "Report and Recommendation"). [DE 593]. Objections to the Report and Recommendation are due on or before January 22, 2025.

4. The Receiver is working diligently to prepare his objections to the Report and Recommendation. However, due to deadlines in other matters, as well as the need to discuss the Receiver's objections with the Federal Trade Commission and the Office of the Attorney General, State of Florida, Department of Legal Affairs, the Receiver requires additional time to prepare and complete his objections.

5. Accordingly, the Receiver respectfully requests an extension of time for an additional nine (9) days, through and including January 31, 2025, to file his objections to the Report and Recommendation.

6. Prior to filing this motion, the Receiver consulted with the Plaintiffs Federal Trade Commission and the Office of the Attorney General, State of Florida, Department of Legal Affairs, and is authorized to represent that the Plaintiffs have no objection to the relief requested herein.

WHEREFORE, the Receiver, Jonathan E. Perlman, Esq., respectfully requests this Court (1) grant the Receiver's Motion for Extension of Time to File Objections to the January 8, 2025 Report and Recommendation, (2) extend the deadline for the Receiver to file objections to the Report and Recommendation through and including January 31, 2025, and (3) for such other relief as this Court may deem just and proper.

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

Undersigned counsel hereby certifies that counsel for the Receiver, conferred with counsel for the Federal Trade Commission and the Office of the Attorney General, State of Florida, Department of Legal Affairs on January 17, 2025, via email, regarding the requested relief and is authorized to represent that the Federal Trade Commission and the Office of the Attorney General,

State of Florida, Department of Legal Affairs have no objection to the relief requested herein.

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By: /s/Gregory M. Garno
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document has been served this day on all counsel of record and entities, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/Gregory M. Garno
Attorney