IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FEDERAL TRADE COMMISSION,	*	
Plaintiff,	*	
v.	*	Case No. GLR-20-3538
RAGINGBULL.COM, LLC, *et al.*,	*	
Defendants.	*	

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MOTION OF TEMPORARY RECEIVER TO EXTEND DEADLINE FOR SUBMISSION OF TEMPORARY RECEIVER'S INITIAL REPORT

Temporary Receiver Peter E. Keith, at the request of Defendants RagingBull.com, LLC; Jason Bond, LLC; Sherwood Ventures, LLC; Jason Bond; and Jeffrey M. Bishop, and with the consent of the Federal Trade Commission, respectfully moves to extend the deadline for the submission of the Temporary Receiver's report, as described in Section XXII of the Modified Temporary Restraining Order [ECF 64], from noon on January 11, 2021 to 5:00 p.m. on February 1, 2021.

On December 8, 2020, the Court entered a temporary restraining order [ECF 21] appointing Mr. Keith as Temporary Receiver. By Order dated December 14, 2020 [ECF 50], the Court rescheduled the preliminary injunction hearing to 9:30 a.m. on January 13, 2021 and set a briefing schedule under which the Temporary Receiver's initial report would be due by noon on January 11, 2021. On December 30, 2020, the Court entered an Order [ECF 104] rescheduling the preliminary injunction hearing to February 5, 2021 at 9:30 a.m. and extending the filing dates for the Defendants' consolidated response to the show cause order and the Federal Trade Commission's

reply to 5:00 p.m. on January 13, 2021, and 5:00 p.m. on January 27, 2021, respectively. Counsel for the Temporary Receiver now requests that the Court extend the deadline for the filing of the Temporary Receiver's initial report to February 1, 2021 at 5:00 p.m.

Good cause exists for the extension. Defendants RagingBull.com, LLC; Jason Bond, LLC; Sherwood Ventures, LLC; Jason Bond; and Jeffrey M. Bishop specifically requested that the Temporary Receiver, before filing his report, review Defendants' filings in opposition to the Federal Trade Commission's motion for preliminary injunction. Defendants assert that the Court will benefit if the Temporary Receiver's analysis is informed, in part, by the submissions of Defendants. Counsel to Defendants RagingBull.com, LLC; Jason Bond, LLC; Sherwood Ventures, LLC; Jason Bond; and Jeffrey M. Bishop have asserted that, conversely, the Temporary Receiver's filing his initial report without having the opportunity to review their opposition may prejudice Defendants.

Section XXII of the Modified Temporary Restraining Order [ECF 64] requires the Temporary Receiver to report to the Court on, among other matters, "whether the business of the Receivership Entities can be operated legally and profitably." The Temporary Receiver has been investigating Defendants' operations since his appointment, while also fulfilling the duties set forth in Section XIV of the temporary restraining order, including taking custody of the assets of the Receivership Entities. Given the volume of material to review, the Temporary Receiver could benefit from additional time to investigate the Receivership Entities' business before reporting to

the Court. Further, extending the deadline for the filing of the Temporary Receiver's report until after the Defendants and the FTC have filed their submissions would afford the Temporary Receiver the opportunity to review the materials submitted by the parties before finalizing his report to the Court. Defendants have indicated a preference that the Temporary Receiver's report be filed after the Defendants' response, and the FTC has consented to having the Temporary Receiver's report be filed last in the sequence of submissions.

The Temporary Receiver accordingly respectfully requests that the Court extend the deadline for the submission of the initial report of the Temporary Receiver to 5:00 p.m. on February 1, 2021.

Respectfully submitted,

GALLAGHER EVELIUS & JONES LLP

/s/ Mark S. Saudek

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