UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 26-60976-CIV-SINGHAL

FEDERAL TRADE COMMISSION,

Plaintiff,
v.

INNOVATIVE PARTNERS, LP, d/b/a., INNOVATIVE HEALTH PLAN or HEALTHCARE PLAN; AMERICAN COLLECTIVE, LP, d/b/a ACLP HEALTH PLAN; HEALTH PLAN ADMINISTRATORS LLC; PAPYRUS GREEN INVESTMENTS LLC; AHMED IBRAHIM SHOKRY; AMERICAN COLLECTIVE, LP; PAPYRUS GREEN INVESTMENTS LLC; and AMANI IBRAHIM SHOKRY

Defendants.
_____/

RECEIVER'S MOTION TO EMPLOY
ACCOUNTING PROFESSIONALS *NUNC PRO TUNC*

The Court-appointed Receiver, Paul O. Lopez (the "Receiver"), by and through his undersigned counsel, respectfully submits this Motion to Employ Accounting Professionals *Nunc Pro Tunc* as of April 15, 2026. In support, the Receiver state as follows:

1. The Federal Trade Commission ("FTC") initiated this action on April 7, 2026 [DE 1]. On April 15, 2026, this Court entered a sealed Temporary Restraining Order which, among other things, appointed Paul O. Lopez as Receiver (the "TRO") [D.E. 13]. On April 7, 2026, the court entered a Stipulated Preliminary Injunction which continued the appointment of Paul Lopez as Receiver [DE 64] (the "Receivership Order").

2. Pursuant to the Receivership Order, the Receiver is obligated to, among other things: (i) take possession of the Receivership Estate's assets of whatever kind and wherever

situated; (ii) continue the operation of the business of the Receivership Estate as needed in order to protect the interests of customers and maximize the value of the assets of the Receivership Estate.

3. To assist in these and other efforts, the Receivership Order allows the Receiver "[t]o choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this order Receivership Order at ¶ XV(F).

4. Accordingly, the Receiver seeks to appoint and retain the firm of Kaufman Rossin (the "Firm") to provide him with accounting, cash management, record-keeping, business advice , business assessment, tax compliance and preparation, and other assistance in this matter.

5. In consideration for the Firm representing the Receiver, the Receiver shall compensate the Firm's professionals. The Firm's professionals will work at significantly reduced rates for the benefit of the Receivership Estate. Attached hereto and collectively marked Exhibit A are the proposed engagement agreements between the receiver and the Firm setting forth the reduced hourly rate charges contemplated by the engagement.

6. The Receiver believes that it is in the best interest of the Receivership Estate to engage the Firm *nunc pro tunc* to April 15, 2026 in order to provide the necessary accounting and tax services to the Receiver and his legal professionals. The Receiver believes that such an engagement is in the best interest of the receivership estate.

WHEREFORE, Paul Lopez, Receiver, respectfully requests that this Court enter the attached proposed order approving the Receiver’s retention of Kaufman Rossin to provide the Receiver with accounting, business assessment, tax compliance and preparation, and other assistance in this matter, as of April 15, 2026, and for such other further relief as the Court deems

just and proper.

TRIPP SCOTT, P.A.
As Counsel to the Receiver
110 S.E. 6th Street, 15th Floor
Ft. Lauderdale, FL 33301
Phone: (954) 525-7500

By: /s/Charles M. Tatelbaum
Charles M. Tatelbaum
Florida Bar No. 177540
cmt@trippscott.com
David A Ray
Florida Bar No. 13871
dar@trippscott.com
aaa@trippscott.com

CONFERRAL CERTIFICATE

Counsel for the FTC has indicated that it does not object to the relief herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of May, 2026, I electronically filed the foregoing document with the Clerk of Court via CM/ECF.

By: */s/ Charles M. Tatelbaum*
Charles M. Tatelbaum, Esquire
Florida Bar No. 177540