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 NINTH MOTION TO EXTEND RECEIVERSHIP

Jonathan E. Perlman, Esq., court-appointed Receiver (the "Receiver"), hereby files his Ninth Motion to Extend Receivership (the "Motion"), and in support thereof, states as follows:

1. On December 1, 2022, the Receiver filed his Eighth Motion to Extend Receivership [ECF No. 551], which this Court subsequently granted. [ECF No. 552]. Accordingly, the Receivership is set to terminate on February 1, 2023. [ECF No. 552].

2. Since the Court's granting of the Eighth Motion to Extend Receivership, the Receiver and his professionals have worked diligently to administer and conclude the Receivership.

3. Specifically, the Receiver received the oustanding amounts due to the Receivership from Howard M. Babcock. Accordingly, the Receiver is in a position to file the final tax returns for the Receivership Entities and will do so imminently.

4. The Receiver also spent time drafting the motion to close out the Receivership, as well as finalizing the accounting for payment of professioanl fees and expenses.

5. The Receiver provided the Plaintiffs with drafts of the motion to close out the Receivership, as well as the final application for payment of professional fees.

6. The Plaintiffs and counsel for the Receiver had two phone calls addressing various issues within those filings, however a few outstanding items need to be addressed before filing.

7. Accordingly, the Receiver respectfully requests an extension of time for an additional ten (10) days, through and including February 10, 2023, to work through the outstanding items and conclude aministration of the Receivership.

8. There exists good cause to extend the Receivership.

9. This is the Receiver's ninth request to extend the Receivership. It is made in good faith and for the benefit of the Receivership Estate and its victims.

10. The Receiver makes this request without prejudice to completing his administration of the Receivership within a shorter period of time, or requesting additional time to complete the administration of the Receivership.

11. Prior to filing this motion, the Receiver consulted with the 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 grant Receiver's Ninth Motion to Extend Receivership, extending the deadline for the Receiver to complete administration of the Receivership through and including February 10, 2023, and for such other relief as this Court may deem just and proper.

/s/Jonathan E. Perlman. Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2023, 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/Jonathan E. Perlman
Jonathan E. Perlman