Docket #0801 Date Filed: 3/4/2020

Nicholas J. Henderson, OSB #074027 E-Mail: nhenderson@portlaw.com MOTSCHENBACHER & BLATTNER LLP 117 SW Taylor Street, Suite 300 Portland, OR 97204-3211

Telephone: 503-417-0508

Fax: 503-417-0501

David W. Porteous, *pro hac vice pending* E-mail: david.porteous@faegredrinker.com Faegre Drinker Biddle & Reath LLP 311 S. Wacker Drive, Suite 4300 Chicago, Illinois 60606, USA

Phone: (312) 356-5117 Fax: (312) 212 6501

## UNITED STATES DISTRICT COURT DISTRICT OF OREGON

SECURITIES EXCHANGE COMMISSION,

CASE NO. 3:16-CV-00438-JR

Plaintiff,

STIPULATED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS OR OTHERWISE RESPONSE TO THE MOTION TO

V.

APPROVE THE RECEIVER'S

AEQUITAS MANAGEMENT, LLC, et al. SERVICES GROUP INC., et al.,<sup>1</sup>

DISTRIBUTION PLAN

Defendants.

Investors Susan Stevens, Terrence Enger, and Gordon Viere (the "Claimants") respectfully request an extension of time through March 6, 2020 at 5:00 p.m. PST, to object or otherwise plead in response to the *Motion to Approve the Receiver's Distribution Plan and Determination of a* 

<sup>&</sup>lt;sup>1</sup> Due to the large number of Defendants in this case, a list is not included.

Ponzi Scheme (the "Plan") filed on December 31, 2019. [Dkt No. 787.] in the above-captioned matter. The Receiver stipulates to this request.

DATED: March 4, 2020

## MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson nhenderson@portlaw.com 117 SW Taylor Street, Suite 300 Portland, OR 97204-3029

Telephone: (503) 417-0508 Facsimile: (503) 417-0501

## STIPULATED TO:

SCHWABE, WILLIAMSON & WYATT, P.C.

/s/ Lawrence Ream (per email authority) Troy Greenfield tgreenfield@schwabe.com Alex I. Poust apoust@schwabe.com Lawrence R. Ream lream@schwave.com 1211 SW 5th Avenue, Suite 1900

Portland, OR 97204 Tel: 503.222.9981 Fax: 503.796.2900

www.portlaw.com

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on March 4, 2020. Notice of this filing will be sent to all participants of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on March 4, 2020 properly addressed as follows:

Patrisha E. Probasco 3240 Ne 131st Avenue Portland, OR 97230

Richard A. Probasco 3240 Ne 131st Avenue Portland, OR 97230

<u>s/ Nicholas J. Henderson</u>

Nicholas J. Henderson, OSB #074027 Motschenbacher & Blattner LLP Telephone: 503-417-0508

Local Counsel for Defendants