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6 Attorneys for Defendants  
 LAWRENCE R. GOLDFARB and  
 7 BAYSTAR CAPITAL MANAGEMENT, LLC

8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**  
 10 **SAN FRANCISCO DIVISION**

LAW OFFICES  
 SIDEMAN & BANCROFT LLP  
 ONE EMBARCADERO CENTER, 8<sup>TH</sup> FLOOR  
 SAN FRANCISCO, CALIFORNIA 94111-3629

12 SECURITIES AND EXCHANGE  
 COMMISSION,

13 Plaintiff,

14 v.

15 LAWRENCE R. GOLDFARB and  
 16 BAYSTAR CAPITAL MANAGEMENT,  
 LLC,

17 Defendants.  
 18  
 19

Case No. 3:11-cv-00938 WHA

**JOINT MOTION OF DEFENDANTS AND  
 RECEIVER JOHN COTTON TO  
 EXTEND DEADLINE UNDER  
 RECEIVERSHIP ORDER (DOCKET 53)  
 AND ~~PROPOSED~~ ORDER**

21 By Order dated June 26, 2012 (Docket 53), the Court ordered that the Receivership  
 22 Defendants (as defined in the Order) file and serve a sworn statement and accounting, with  
 23 complete documentation, covering the period January 1, 2006 to the present, reflecting assets, bank  
 24 accounts, credit card accounts, funds received related to the conduct alleged in the Complaint,  
 25 expenditures over \$1,000 and all transfers made, and file and serve tax returns from 2006 to 2011.  
 26 (Docket 53, Paragraphs 9, 10).

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1 The Receivership Defendants are attempting to prepare the required statement and  
2 accounting and assemble the tax returns, but the information requested is voluminous and involves  
3 time periods as to which Defendants have been thus far been unable to gather or retrieve the  
4 relevant information and thus the Defendants need additional time to make these submissions.

5 In addition, the Receiver, John W. Cotton, Esq., who joins in this Motion, believes that  
6 Defendant Lawrence Goldfarb's time in the near term would best be spent assisting the Receiver,  
7 as he has been doing, in securing receivership assets.

8 Accordingly, Defendants and the Receiver request a thirty (30) day extension for the  
9 Receivership Defendants to make the submissions set forth in Paragraphs 9 and 10 of the Order.

10 The Receiver confirms that due to other more pressing work on the receivership, the  
11 Receiver will not be able to review the submissions for at least thirty days and accordingly this  
12 extension will not negatively impact his work or the receivership estate.

13 The Receiver has consulted counsel for the Plaintiff regarding this request and Plaintiff's  
14 counsel has indicated that the SEC does not oppose the requested extension.

15  
16 DATED: July 24, 2012

17 Respectfully submitted,  
18 SIDEMAN & BANCROFT LLP

19 By: /s/ Steven M. Katz  
20 STEVEN M. KATZ  
21 Attorneys for Defendants  
22 LAWRENCE R. GOLDFARB and  
23 BAYSTAR CAPITAL MANAGEMENT, LLC

24 DATED: July 24, 2012

25   
26 \_\_\_\_\_  
27 JOHN W. COTTON, ESQ.  
28 Receiver

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~~[Proposed]~~ ORDER

**GOOD CAUSE APPEARING**, the deadline for Defendants to make the submissions due under Paragraphs 9 and 10 of the Order Granting Plaintiff's Application for Appointment of Receiver (Docket 53) is extended by thirty calendar days.

**IT IS SO ORDERED**



DATED: July 25, 2012.

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William Alsup  
UNITED STATES DISTRICT JUDGE