1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	NORTHERN DISTRI	DISTRICT COURT ICT OF CALIFORNIA SCO DIVISION 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
 20 21 22 23 24 25 26 27 28 	By Order dated June 26, 2012 (Docket 53), the Court ordered that the Receivership Defendants (as defined in the Order) file and serve a sworn statement and accounting, with complete documentation, covering the period January 1, 2006 to the present, reflecting assets, bank accounts, credit card accounts, funds received related to the conduct alleged in the Complaint, expenditures over \$1,000 and all transfers made, and file and serve tax returns from 2006 to 2011. (Docket 53, Paragraphs 9, 10). ///	
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	 E-Mail: rnelson@sideman.com STEVEN M. KATZ (State Bar No. 164617) E-Mail: skatz@sideman.com SIDEMAN & BANCROFT LLP One Embarcadero Center, Eighth Floor San Francisco, California 94111-3629 Telephone: (415) 392-1960 Facsimile: (415) 392-0827 Attorneys for Defendants LAWRENCE R. GOLDF ARB and BAYSTAR CAPITAL MANAGEMENT, LLC 8 UNITED STATES 9 NORTHERN DISTRI 10 SECURITIES AND EXCHANGE COMMISSION, 13 Plaintiff, 14 V. 15 LAWRENCE R. GOLDF ARB and BAYSTAR CAPITAL MANAGEMENT, LLC 16 17 18 19 20 21 By Order dated June 26, 2012 (Docket 52) Defendants (as defined in the Order) file and ser 23 complete documentation, covering the period Jar 24 accounts, credit card accounts, funds received re expenditures over \$1,000 and all transfers made, 26 (Docket 53, Paragraphs 9, 10). <i>11</i>

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

In addition, the Receiver, John W. Cotton, Esq., who joins in this Motion, believes that
Defendant Lawrence Goldfarb's time in the near term would best be spent assisting the Receiver,
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.

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

DATED: July 9, 2012

DATED: July, 24, 2012

Respectfully submitted, SIDEMAN & BANCROFT LLP

By: /s/ Steven M. Katz

STEVEN M. KATZ Attorneys for Defendants LAWRENCE R. GOLDFARB and BAYSTAR CAPITAL MANAGEMENT, LLC

COTTON, ESO.

Receiver

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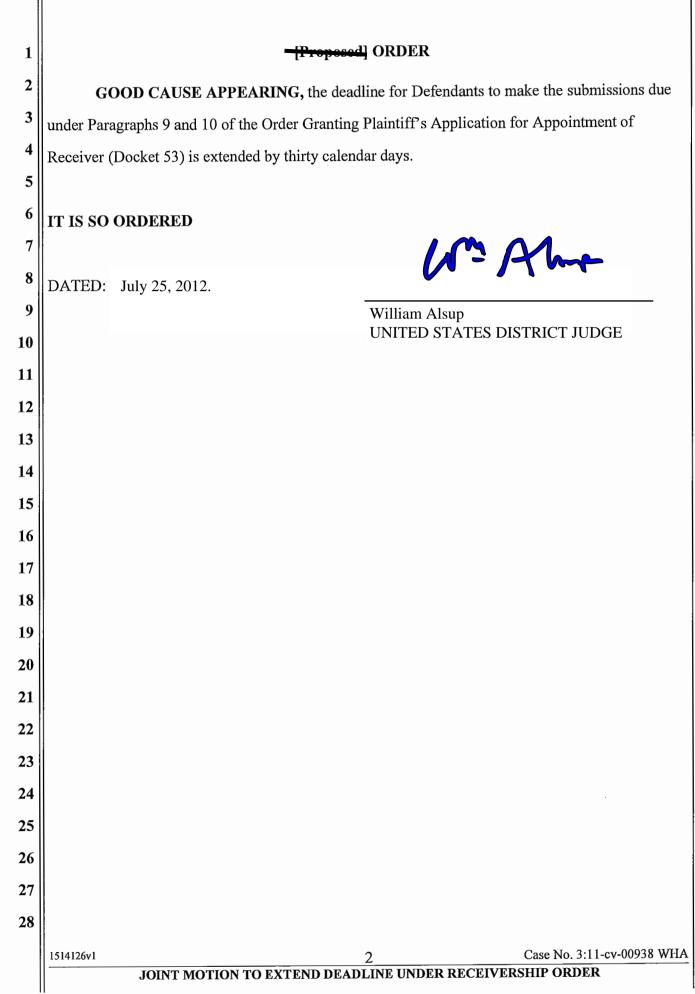
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JOINT MOTION TO EXTEND DEADLINE UNDER RECEIVERSHIP ORDER



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