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 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

14 SECURITIES AND EXCHANGE COMMISSION,

Case No. 3:16-cv-01386-EMC

15 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
 EXTENDING TIME TO MOVE TO
 AMEND THE COMPLAINT AS TO
 POTENTIAL DEFENDANT 1**

16 v.

17 JOHN V. BIVONA; SADDLE RIVER
 18 ADVISORS, LLC; SRA MANAGEMENT
 ASSOCIATES, LLC; FRANK GREGORY
 19 MAZZOLA,

20 Defendants, and

21 SRA I LLC; SRA II LLC; SRA III LLC;
 22 FELIX INVESTMENTS, LLC; MICHELE
 J. MAZZOLA; ANNE BIVONA; CLEAR
 23 SAILING GROUP IV LLC; CLEAR
 SAILING GROUP V LLC,

24 Relief Defendants.
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1 **STIPULATION EXTENDING TIME TO MOVE TO AMEND THE COMPLAINT**

2 Plaintiff Securities and Exchange Commission (“Commission”) and Potential Defendant 1¹
3 hereby stipulate to extend the Commission’s time to file a motion to amend the Complaint to add
4 Potential Defendant 1 as a defendant in this matter until January 31, 2017.

5 Commission staff, Potential Defendant 1, and Potential Defendant 1’s counsel, Jahan Raissi,
6 are currently involved in discussions concerning the possible resolution of the Commission’s claims
7 against Potential Defendant 1. To provide sufficient time to complete these negotiations, the
8 Commission and Potential Defendant 1 stipulate as follows:

9 The Commission shall have until January 31, 2017 to file a motion to add Potential Defendant
10 1 to this action. The deadline for moving to amend the Complaint as to any other claim or
11 defendant remains October 31, 2016.

12 Dated: October 5, 2016

Respectfully submitted,

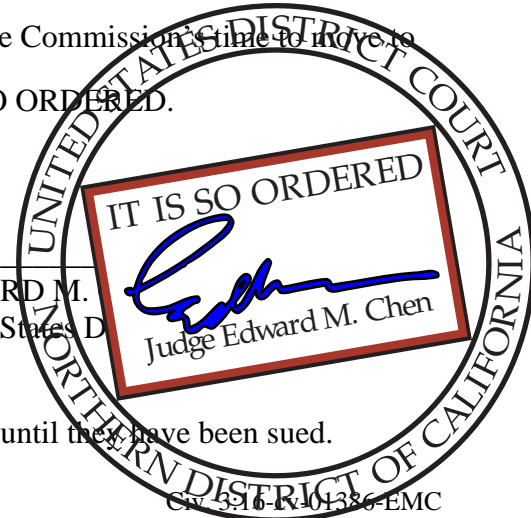
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14 /s/ Jessica W. Chan
15 Jessica W. Chan
16 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION

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18 /s/ Jahan P. Raissi
19 Jahan P. Raissi
20 Attorneys for Potential Defendant 1
SHARTSIS FRIESE LLP

21 The parties having stipulated to the foregoing concerning the Commission’s time to move to
22 amend the Complaint with respect to Potential Defendant 1, it is SO ORDERED.

23
24 DATED: October 7, 2016

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26 EDWARD M.
United States D



27 ¹ The Commission’s practice is not to identify potential defendants until they have been sued.