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5	Au C. N. D.		
6	Attorneys for Non-Party TELESOFT CAPITAL, LLC		
7			
8			
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12			
13	SECURITIES AND EXCHANGE COMISSION,	Case No. 3:16-cv-01386-EMC	
14		STIPULATION AND [PROPOSED] ORDER GRANTING NON-PARTY TELESOFT	
15	Plaintiff,	CAPITAL, LLC'S ADMINISTRATIVE MOTION TO REQUEST NOTICE AND AN	
16	v.	OPPORTUNITY TO BE HEARD	
17	JOHN V. BIVONA; SADDLE RIVER	Judge: Hon. Edward Chen	
18	ADVISORS LLC; SRA MANAGEMENT LLC; FRANK GREGORY MAZZOLA,		
19	Defendants, and		
20	SRA I LLC; SRA II LLC; SRA III LLC;		
21	FELIX INVESTMENTRS, LLC; MICHELE		
22	J. MAZZOLA; ANNE BIVONA; CLEAR SAILING GROUP IV LLC; CLEAR		
23	SAILING GROUP V LLC,		
24	Relief Defendants.		
25			
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COOLEY LLP ATTORNEYS AT LAW		STIPULATION AND [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION 3:16-cv-01386-EMC	

1	WHEREAS, on October 11, 2016, the Court entered an order for appointment of Received		
2	in the above-captioned action ("Receiver Order", Dkt. #142);		
3	WHEREAS, before the Court i	s an administrative motion to confirm that non-party	
4	TeleSoft Capital, LLC (the "Non-Party"	") is entitled to notice and an opportunity to be heard	
5	before the Receiver approves, negotiate	es for the sale or transfers pre-IPO shares of Palantin	
6	Technologies, Inc. ("Palantir"), pursuant to Sections IX and XIV of the Receiver Order (the		
7	"Motion");		
8	WHEREAS, Plaintiff and the Receiver do not take any position on the representation		
9	made in Non-Party's Motion;		
10	NOW, THEREFORE, Plaintiff, the Receiver and Non-Party, by and through their		
11	undersigned counsel, hereby agree and stipulate as follows:		
12	1. If the Receiver requests the Court's approval for sales of Palantir shares from the		
13	Set-Aside Fund, Non-Party is entitled to two-weeks expedited notice, with any opposition b		
14	Non-Party due in writing five court days after the Receiver's expedited motion;		
15	2. In accordance with this	Order, the Clerk shall add Non-Party's undersigned	
16	counsel to an ECF user in the above-captioned action.		
17	Respectfully Submitted,		
18			
19	PA	OOLEY LLP ATRICK E. GIBBS	
20	AL	LLISON S. DAVIDSON	
21			
22	-	/s/ Patrick E. Gibbs PATRICK E. GIBBS (183174)	
23	At	torneys for Non-Party	
24	TE	ELESOFT CAPITAL, LLC	
25			
26	;		
27	,		
28			

1	Dated: October 19, 2016	SECURITIES AND EXCHANGE COMMISSION	
2			
3		/s/ John S. Yun	
4		JOHN S. YUN	
5		Attorneys for Plaintiff SECURITIES AND EXCHANGE COMMISSION	
6			
7	D . 1 0 . 1 . 10 2016	CARTENDED C. CELEAND & HAVEONALD	
8	Dated: October 19, 2016	GARTENBERG, GELFAND & HAYTON LLP JOHN W. COTTON	
9			
10		/s/ John W. Cotton	
11		JOHN W. COTTON	
12		Attorneys for Receiver	
13			
14			
15	E-FILER'S ATTESTATION		
16	Pursuant to Civil Local Rule 5.1(i)(3), the undersigned attests that parties to this		
17	Stipulation have concurred in the filing of this STIPULATION AND [PROPOSED] ORDER		
18	GRANTING NON-PARTY TELESOFT CAPITAL, LLC'S ADMINISTRATIVE MOTION TO		
19	REQUEST NOTICE AND AN OPPORTUNITY TO BE HEARD.		
20	DATED 0 1 10 2016		
21	DATED: October 19, 2016	By: <u>/s/ Patrick E. Gibbs</u> Patrick E. Gibbs	
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LAW		STIPULATION AND [PROPOSED] ORDER 2 GRANTING ADMINISTRATIVE MOTION	

COOLEY LLP ATTORNEYS AT LAW

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDER.

HAN EDWARD
IT IS SO ORDERED
Judge Edward M. Chen
Judge Edward M. Chen