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

11 SECURITIES AND EXCHANGE
 12 COMMISSION,

Case No. 3:17-CV-00223-RS

13 Plaintiff,

14 vs.

**STIPULATION AND ORDER RE
 WITHDRAWAL OF RECEIVER'S
 SECOND MOTION FOR ORDER
 ALLOWING AND DISALLOWING NON-
 EB5-INVESTOR CLAIM IN PART
 (ANGEL KEENE) PURSUANT TO
 LOCAL RULE 7-7(e)**

15 SAN FRANCISCO REGIONAL CENTER, LLC;
 THOMAS M. HENDERSON; CALIFORNIA
 16 GOLD MEDAL, L.P.; CALLSOCKET, L.P.;
 CALLSOCKET II, L.P.; CALLSOCKET III,
 17 L.P.; COMPREHENSIVE CARE OF
 OAKLAND, L.P.; NA3PL, L.P.; WEST
 18 OAKLAND PLAZA, L.P.; CALLSOCKET,
 LLC; CALLSOCKET II, LLC; CALLSOCKET
 19 III, LLC; COMPREHENSIVE CARE OF
 CALIFORNIA, LLC; IMMEDIA, LLC; and
 20 NORTH AMERICA 3PL, LLC,

Judge: Hon. Richard Seeborg
 Date: August 13, 2030
 Time: 1:30 p.m.
 Crtrm.: 450 Golden Gate Ave.
 17th Floor, Courtroom 3
 San Francisco, CA 94102

21 Defendants,

22 -and-

23 CALLSOCKET HOLDING COMPANY, LLC;
 CALLSOCKET III HOLDING COMPANY,
 24 LLC; BERKELEY HEALTHCARE
 DYNAMICS, LLC; CENTRAL CALIFORNIA
 25 FARMS, LLC; and JL GATEWAY, LLC,

26 Relief Defendants.

Wendel Rosen LLP
 1111 Broadway, 24th Floor
 Oakland, California 94607-4036

1 The Receiver Susan L. Uecker (“Receiver”), and Angel Keene ("Keene"), a claimant in
2 this action, submit this stipulated request for order withdrawing the Receiver's Second Motion for
3 Order Allowing And Disallowing Non-Eb5 Investment Claim In Part (Angel Keene)("Motion")
4 pursuant to Civil Local Rule 7-7(e), and stipulate and agree as follows:

5 WHEREAS, on May 28, 2020, the Receiver served a letter objection (the "Objection") by
6 email to counsel for Keene, objecting the Proof of Claim filed herein by Keene;

7 WHEREAS, on July 2, 2020, the Receiver filed her Motion, supported by the declarations
8 of the Receiver, and counsel for the Receiver, a request for judicial notice, and certificate of
9 service, and served the Motion on counsel for Keene by first class mail postage prepaid (Docket
10 Nos. 806);

11 WHEREAS, the Receiver set the Motion for hearing before the Court on August 13, 2020
12 at 1:30 p.m.;

13 WHEREAS, on July 20, 2020, Keene filed an Opposition to the Receiver's Motion for
14 Order Allowing and Disallowing Non-EB-5 Investment Claim in Part, supported by the
15 declaration of Keene's counsel ("Opposition")(Docket No. 812);

16 WHEREAS, in the Opposition, counsel for Keene contends, among other things, that she
17 never received the Objection served by email and that service by email was improper under Fed.
18 R. Civ. P. 5;

19 WHEREAS, if filing a reply brief in support of her Motion, the Receiver's counsel would
20 contend, among other things, supported by declarations, that the Objection was sent and received
21 and that Fed. R. Civ. P. 5 did not apply to the service of the Objection;

22 WHEREAS, notwithstanding the disputed issues of service of the Objection, the Receiver
23 and Keene both agree that Keene should have an additional twenty (20) days to submit to the
24 Receiver all evidence to support Keene's claims for damages;

25 WHEREAS, to provide Keene with the additional twenty (20) days to submit evidence of
26 Keene's claims for damages, the Receiver and Keene both stipulate and agree that the Motion
27 should be withdrawn pursuant to Local Rule 7-7(e);
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WHEREAS, Plaintiff, the Securities and Exchange Commission does not oppose this Stipulation, the requested relief and attached Proposed Order;

NOW, THEREFORE, the Receiver, and Keene stipulate to, and respectfully request that the Court enter, the attached Proposed Order withdrawing the Receiver's Motion, and providing Keene with twenty (20) days from the entry of the Proposed Order to submit to the Receiver all evidence to support Keene's claims for damages.

STIPULATED AND AGREED TO BY:

DATED: July 22, 2020 WENDEL ROSEN LLP

By: /s/ Elizabeth Berke-Dreyfuss
Elizabeth Berke-Dreyfuss
Attorneys for Susan L. Uecker, Receiver

DATED: July 22, 2020 BURTON EMPLOYMENT LAW

By: /s/ Jocelyn Burton
Jocelyn Burton
Attorneys for Angel Keene

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ORDER

Based on the forgoing stipulation and good cause appearing,

IT IS HEREBY ORDERED that the Receiver's Second Motion for Order Allowing and Disallowing Non-EB-5 Investment Claim In Part (Angele Keene)(Docket No. 806), is hereby withdrawn;

IT IS FURTHER ORDERED that Angel Keene shall have twenty (20) days from the date of the entry of this Order to submit to the Receiver all evidence in support of Angel Keene's claims for damages.

IT IS SO ORDERED.

DATED: July 22, 2020



Richard Seeborg
United States District Judge