

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ARTHUR NADEL, et al.,

Defendants.

CASE NO.: 8:09-cv-0087-T-26TBM

SCOOP REAL ESTATE, L.P., et al.

Relief Defendants.

**RECEIVER'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
WELLS FARGO BANK, N.A.'S LIMITED OBJECTION TO RECEIVER'S
UNOPPOSED MOTION TO APPROVE SIXTH INTERIM DISTRIBUTION
AND INCREASE CERTAIN RESERVES**

Burton W. Wiand, as Receiver (“the Receiver”), by and through his undersigned counsel, respectfully moves this Court for the entry of an order providing for a four-day extension of time to respond to Wells Fargo Bank, N.A.’s (“the Bank”) limited objection to the Receiver’s unopposed motion to approve sixth interim distribution and increase certain reserves. In support thereof, the Receiver states as follows:

- 1) On December 20, 2016, the Receiver filed his Unopposed Motion to Approve Sixth Interim Distribution and Increase Certain Reserves (“the Distribution Motion”). (Doc. 1253).
- 2) The next day, the Bank filed its limited objection and memorandum of law (“the Objection”) to the Distribution Motion. (Doc. 1254). The Court subsequently ordered the Receiver to respond to the Objection by January 5, 2017.

3) The undersigned counsel was in Los Angeles, California last week for an evidentiary hearing¹. In addition, the undersigned counsel will be out of the office from December 27, 2016 through January 3, 2017. Accordingly, the Receiver respectfully requests entry of an order extending the deadline to respond to the Bank's Objection from January 5, 2017 to January 9, 2017.

4) A grant of the relief requested will not unduly prejudice any party and will not unduly delay the final disposition of this matter.

5) In accordance with Local Rule 3.01(g), the undersigned counsel conferred with the Bank and can represent that the Bank does not oppose the requested relief.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 26, 2016, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

Respectfully submitted,

JAMES HOYER, P.A.

/s/ Sean P. Keefe

Sean P. Keefe (FBN 413828)

One Urban Centre, Suite 550

4830 W. Kennedy Blvd.

Tampa, FL 33609

Telephone: (813) 397-2300

Facsimile: (813) 397-2310

E-Mail: skeefe@jameshoyer.com

Attorney for the Receiver, Burton W. Wiand

¹ See *United States ex rel. Karin Berntsen v. Prime Healthcare et al*, Case No. 11-cv-08214-PJW (C.D. Cal.).