

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

Case No.: 8:09-cv-87-T-26TBM

v.

ARTHUR NADEL; SCOOP CAPITAL,  
LLC; SCOOP MANAGEMENT, INC.

Defendants.

SCOOP REAL ESTATE, L.P.;  
VALHALLA INVESTMENT PARTNERS,  
L.P.; VALHALLA MANAGEMENT, INC.;  
VICTORY IRA FUND, LTC; VICTORY  
FUND, LTD; VIKING IRA FUND, LLC;  
VIKING FUND, LLC; and VIKING  
MANAGEMENT, LLC,

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**STIPULATION BETWEEN LA BELLASARA CONDOMINIUM ASSOCIATION,  
INC. AND WELLS FARGO, N.A. IN RESPONSE TO COURT'S ORDER OF  
JUNE 13, 2017(DKT. 1293)**

In response to this Court's Order dated June 13, 2017, La Bellasara Condominium Association, Inc., and Wells Fargo, N.A., by and through their undersigned counsel, hereby file the following stipulation as to the Receiver's Unopposed Motion filed on June 12, 2017(Dkt. 1291):

1. On June 12, 2017, Burton W. Wiand, as Receiver filed Receiver's Unopposed Motion for: (I) Approval of Settlement with Wells Fargo, N.A.; (II) Entry of

an Order Authorizing Disbursement of Sale Proceeds to Wells Fargo, N.A.; (III) and Relief from Injunction, Permitting Wells Fargo to Foreclose on the Laurel Mountain Property [Doc 1291].

2. La Bellasara Condominium Association, Inc. ("La Bellasara") filed a Motion for Time to File Potential Objection [Doc 1292].

3. On June 13, 2017, the Court entered an Order granting La Bellasara's Motion and ordered that La Bellasara file its potential objection on or before June 20, 2017.

4. La Bellasara Condominium Association does not object to the relief requested in the Unopposed Motion, *except* the proposed disbursement to Wells Fargo from the sale of the LaBellasara Property in the amount of \$2,106,140.29 (the "**Sale Proceeds**"). Wells Fargo and La Bellasara Condominium Association agree and stipulate to the Receiver disbursing \$103,109.60 (the "**Association Funds**") to La Bellasara Condominium Association from the Sale Proceeds in full and complete satisfaction of La Bellasara Condominium Association's claim for past due assessments, interest, fees and expenses against the La Bellasara Property while the Receiver owned the La Bellasara Property. After payment of the Association Funds, the remaining Sale Proceeds shall be disbursed to Wells Fargo.

**LOCAL RULE 3.01(g) CERTIFICATION**

The undersigned counsel for La Bellasara has conferred with counsel for the Receiver and counsel for the Securities and Exchange Commission and is authorized to represent that they do not object to the disbursement agreed upon by La Bellasara and Wells Fargo as reflected in this Stipulation.

/s/ Steven R. Wirth  
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*Attorneys for La Bellasara Condominium Association, Inc.*

**CERTIFICATE OF SERVICE**

I CERTIFY that on this 20<sup>th</sup> day of June, 2017, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Martin Garcia  
Martin Garcia, FBN: 0817597