

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

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

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

Defendants,

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

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

Relief Defendants.

**AGREED MOTION FOR EXTENSION OF TIME FOR RECEIVER
TO RESPOND TO MOTIONS FILED BY WELLS FARGO BANK, N.A.**

Burton W. Wiand, as Receiver (the “**Receiver**”) for Valhalla Investment Partners, L.P.; Viking Fund, LLC; Viking IRA Fund, LLC; Victory Fund, Ltd.; Victory IRA Fund, Ltd.; and Scoop Real Estate, L.P., seeks an extension of time to file its responses to *Wells Fargo’s Motion for Payment of Certain Fees and Costs as Administrative Expenses* (Doc. No. 1334) and *Wells Fargo’s Motion for Order Directing Receiver to Turnover Rents from Rite Aid Property* (Doc. No. 1332) (collectively, the “**Motions**”). Counsel for Wells Fargo has agreed to the relief requested in this Motion. In support, the Receiver states:

1. Wells Fargo Bank N.A. (“**Wells Fargo**”) filed the Motions on December 1, 2017.
2. The 14-day deadline for the Receiver to file responses to the Motions under Local Rule 3.01(b) falls on December 15, 2017 (the “**Deadline**”).
3. The Receiver seeks a 7-day extension of the Deadline, such that the extended deadline would fall on Friday, December 22, 2017.

WHEREFORE, the Receiver respectfully requests that the Court enter an order, substantially in the form as the proposed order attached as **Exhibit A**: (i) granting this Motion; (ii) extending the Receiver’s deadline under Local Rule 3.01(b) to December 22, 2017; and (iii) granting such other and further relief as this Court deems just and proper.

LOCAL RULE 3.01(g) CERTIFICATION

The undersigned has conferred in good faith with counsel for Wells Fargo regarding the relief requested in this motion. Counsel for Wells Fargo has agreed to the extension requested in this motion.

/s/ Susan Heath Sharp
Susan Heath Sharp (FBN 716421)
Matthew B. Hale (FBN 0110600)
Stichter Riedel Blain & Postler, P.A.
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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

/s/Susan Heath Sharp
Attorney

EXHIBIT A

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_____ /

ORDER

This cause comes before the Court for consideration of *Agreed Motion for Extension of Time for Receiver to Respond to Motions filed by Wells Fargo Bank, N.A.* (the “Motion”)¹(Doc. No. ____). Counsel for the Receiver has represented that Wells Fargo, N.A. has consented to the relief requested. The Court having considered the Motion and being fully advised in the premises finds that the Motion should be granted. Accordingly, it is

ORDERED that:

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1. The Motion is Granted.
2. The deadline under Local Rule 3.01(b) for the Receiver to filed responses and/or objections to *Wells Fargo's Motion for Payment of Certain Fees and Costs as Administrative Expenses* (Doc. No. 1334) and/or *Wells Fargo's Motion for Order Directing Receiver to Turnover Rents from Rite Aid Property* (Doc. No. 1332) is extended to December 22, 2017.

DONE and **ORDERED** in chambers in Tampa, Florida this _____ day of _____, 2017.

/s/
RICHARD A. LAZZARA
UNITED STATES DISTRICT JUDGE

COPIES FURNISHED TO:
Counsel of Record