

**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-cv-0087-T-33CPT

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.

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**RECEIVER'S MOTION FOR FOURTEEN-DAY EXTENSION  
OF DEADLINE TO SERVE OBJECTING CLAIMANTS WITH  
NOTIFICATION OF RECEIVER'S EVALUATION OF OBJECTIONS**

Burton W. Wiand, as receiver (the “**Receiver**”) for Quest Energy Management Group, Inc. (“**Quest**”), respectfully moves the Court to extend the deadline for serving notifications of the Receiver’s evaluation of objections from June 3, 2019 to June 17, 2019.

On March 7, 2019, the Receiver filed his Motion to (1) Approve Determinations and Priority of Claims, (2) Pool Receivership Assets and Liabilities, (3) Approve Plan of

Distribution, and (4) Establish Objection Procedure (the “**Motion**”) (Doc. 1383). The Court granted the Motion on March 15, 2019 (the “**Order**”) (Doc. 1384). Pursuant to the Order, claimants had until April 19, 2019 to submit an objection to the Receiver’s determination of their respective claims, claim priority, or plan of distribution.

The Receiver received objections from claimants in connection with eleven claims (Claim Numbers 1, 2, 3, 4, 5, 17, 72, 73, 74, 75, and 79). *See also* Receiver’s Notice of Objections Regarding Claims Process for Quest Energy Management Group, Inc. (Doc. 1395). The next step in the objection procedure approved by the Court requires the Receiver to evaluate the objections and to notify the objecting claimants of his evaluations by June 3, 2019 (the “**Notifications**”). A brief extension of this deadline is necessary because the Receiver is completing the sale of most Quest assets and is preparing a motion to approve the sale, which he anticipates filing shortly. While the Receiver has done substantial work toward completing the Notifications, due to the efforts needed to complete the sale of Quest’s assets, the Receiver requires additional time to finalize and serve the Notifications. The requested extension is not being sought to delay the proceedings or for any other improper reason, and no party will be prejudiced by the brief extension.

WHEREFORE, the Receiver respectfully requests a fourteen-day extension of the deadline for serving Notifications of the Receiver’s evaluation of objections from June 3, 2019 to June 17, 2019.

**CERTIFICATE UNDER LOCAL RULE 3.01(g)**

Undersigned counsel for the Receiver has conferred with counsel for the SEC and is authorized to represent to the Court that the SEC does not oppose the relief requested in this motion. Counsel for the Receiver has not conferred with the nonparty claimants.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on May 30, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system.

**s/Jared J. Perez**

Jared J. Perez, FBN 0085192

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