

**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-26TBM

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

Relief Defendants.

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**RECEIVER'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO COMPLETE MEDIATION**

Burton W. Wiand, as Receiver (the "**Receiver**"), by and through his undersigned attorneys, hereby moves this Court for entry of an Order extending the time in which to complete the mediation of unresolved issues pending between the Receiver and Wells Fargo Bank, N.A. ("**Wells Fargo**" or the "**Bank**") until July 20, 2012, and states the following in support.

1. On May 14, 2012, the Court entered an order directing the Receiver and Wells Fargo to mediate all unresolved matters pending between them within forty-five (45) days of the order, which is June 28, 2012. (Doc. 847)
2. While the Receiver attempted to schedule the mediation conference to occur prior to

June 28, 2012, the earliest two consecutive dates upon which the Receiver, the Bank, and the agreed-upon mediator are collectively available are July 19 and 20, 2012.

WHEREFORE, the Receiver respectfully requests that the Court enter an order extending the time for the Receiver and Wells Fargo Bank, N.A. to complete the mediation until July 20, 2012.

Dated: June 5, 2012

Respectfully submitted,

**/s/ Jonathan B. Cohen**

Jonathan B. Cohen (FBN 0027620)  
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*Attorney for the Receiver, Burton W. Wiand*

**LOCAL RULE 3.01(g) CERTIFICATION**

Counsel for the Receiver has conferred with counsel for Wells Fargo Bank, N.A. and is authorized to represent to the Court that this Motion is unopposed.

**/s/ Jonathan B. Cohen**  
*Attorney for the Receiver, Burton W. Wiand*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2012, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send an electronic copy of this Motion to L. Joseph Shaheen, Jr., Esquire and Steven R. Wirth, Esquire of Akerman Senterfitt, counsel for Wells Fargo Bank, N.A., successor-in-interest to Wachovia Bank, N.A.

**/s/ Jonathan B. Cohen**  
*Attorney for the Receiver, Burton W. Wiand*