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COUNSEL/PARTIES OF RECORD	
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p style="font-size: 1.2em; margin: 0;">DEC 27 2017</p> </div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**  
11 **Northern Division**

13 **SECURITIES AND EXCHANGE  
14 COMMISSION,**

15 **Plaintiff,**

16 **vs.**

17 **DAVID B. KAPLAN, ESQ.,**  
18 **SYNCHRONIZED ORGANIZATIONAL**  
19 **SOLUTIONS, LLC,**  
20 **SYNCHRONIZED ORGANIZATIONAL**  
21 **SOLUTIONS INTERNATIONAL, LTD.,**  
22 **and MANNA INTERNATIONAL**  
23 **ENTERPRISES, INC.,**

24 **Defendants,**

25 **and**

26 **LISA M. KAPLAN,**  
27 **THE WATER-WALKING**  
28 **FOUNDATION, INC., and**  
**MANNA INVESTMENTS, LLC,**

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

**Honorable Miranda Du**

**STIPULATION TO EXTEND TIME TO  
FILE CASE MANAGEMENT REPORT AND  
HOLD CASE MANGEMENT  
CONFERENCE**

**THIRD REQUESTED EXTENSION**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1           1.       On August 29, 2017, Plaintiff United States Securities and Exchange Commission  
2 (“SEC” or “Commission”), Defendant David B. Kaplan, and Relief Defendant Lisa Kaplan  
3 (collectively, the “Parties”) filed a Stipulation for Extension of Time to File Case Management  
4 Report and Hold Case Management Conference (First Request). (ECF No. 86.)

5           2.       On September 5, 2017, the Honorable Magistrate Judge Valerie B. Cooke granted  
6 the request (ECF No. 87), scheduled a case management conference for October 18, 2017, at 9:30  
7 a.m. PDT, and directed the parties to file a case management report no later than the close of  
8 business on October 6, 2017 (ECF No. 88).

9           3.       Thereafter, the Parties reached an agreement to resolve this matter. Defendant David  
10 Kaplan and Relief Defendant Lisa Kaplan have executed consents to the terms of settlement before  
11 a notary public, and the SEC staff has commenced the process of obtaining approval of the  
12 agreement by the Commission.

13           4.       On October 4, 2017 the Parties filed a Stipulation for Extension of Time to File Case  
14 Management Report and Hold Case Management Conference (Second Request), requesting a 90-  
15 day extension of time to file the case management report, or until January 5, 2018, to allow for  
16 sufficient time to obtain Commission approval. (ECF No. 89.)

17           5.       On October 10, 2017, the Court granted the request. (ECF No. 90.)

18           6.       The SEC staff continues to seek approval of the agreement by the Commission and  
19 estimates that it will need an additional 30 days to obtain final approval.

20           7.       Once approval has been obtained, the SEC will file a Motion for Entry of Judgment  
21 before the Honorable Miranda Du.

22           8.       The Parties expect that this process will be complete by end of January 2018.

23           9.       Accordingly, the Parties respectfully request that the time to file the case  
24 management report be extended approximately 30 days, or until February 5, 2018, and that the case  
25 management conference be scheduled sometime thereafter, at the convenience of the Court.

26           10.       This is the Parties’ third request for an extension of time regarding the case  
27 management report and conference.

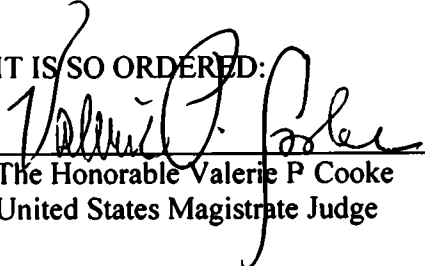
28       Date: December 15, 2017

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8  
9 IT IS SO ORDERED:  
10   
11 The Honorable Valerie P Cooke  
United States Magistrate Judge

Dated: December 27, 2017

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