

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

CASE NO.: 8:20-cv-394

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

KINETIC INVESTMENT GROUP, LLC, and
MICHAEL SCOTT WILLIAMS,

Defendants, and

KINETIC FUNDS I, LLC,
KCL SERVICES, LLC d/b/a LENDACY,
SCIPIO LLC,
LF42, LLC,
EL MORRO FINANCIAL GROUP, LLC,
and KIH, INC. f/k/a KINETIC INTERNATIONAL, LLC,

Relief Defendants.

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
TO RESPOND TO RECEIVER’S MOTION FOR POSSESSION**

The Defendant MICHAEL SCOTT WILLIAMS (“Williams”), through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), and Middle District Local Rule 3.01, moves for an additional extension of time to respond to *Receiver’s Motion For Possession Of And Title To Residential Real Property Purchase By Defendant Michael Williams In San Juan, Puerto Rico And Incorporated Memorandum Of Law* (“Motion for Possession”)[DE 72], and states as follows:

1. This unopposed Motion seeks a seven (7) day extension of time for Defendant Mr. Williams to respond to the *Receiver's Motion For Possession Of And Title To Residential Real Property Purchase By Defendant Michael Williams In San Juan, Puerto Rico And Incorporated Memorandum Of Law* ("Motion for Possession")[DE 72].

2. On May 15, 2020, the Receiver filed its Motion for Possession, which asks this Court to give the receiver "possession of and title to" residential real property located in San Juan, Puerto Rico. [DE 72 at pp.1-2].

3. On May 29, 2020, this Court entered its Order granting Defendant Williams a thirty-day extension of time to respond to the Receiver's Motion for Possession. [DE 87]. As a result, the deadline for the Defendant's Response is Monday, June 29, 2020.

4. However, counsel for both Mr. Williams and the Receiver have been involved in advanced discussions with regards to the Motion for Possession and the property in Puerto Rico, and are optimistic that they will be able to reach an agreement subject to continuing discussions.

5. In the event an agreement is reached, the parties will need additional time to come to an agreement on the particular language to be put into an Order, and believe that a brief seven (7) day extension will give them sufficient time to do so.

6. This Motion is not being filed for the purpose delay, but in the anticipation that an agreement on the Motion for Possession can be finalized.

WHEREFORE, the Defendant Michael Williams moves this Court for a 7-day extension of time to file its response to the Receiver's Motion for Possession and for any and all other relief this Court deems necessary.

LOCAL RULE 3.01(g) CERTIFICATE OF GOOD FAITH CONFERENCE

I HEREBY CERTIFY that, in accordance with Middle District Local Rule 3.01(g), the undersigned has conferred with counsel for the Receiver, via e-mail on June 29, 2020, in a good faith effort to resolve the issues raised herein, and Receiver's counsel advised the undersigned that the Receiver has no objection to the requested extension.

Respectfully Submitted,

By: /s/ Timothy W. Schulz
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 29 2020, the foregoing document was filed with the Clerk of the Court using the CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List via transmission of the Notice of Electronic Filing generated by CM/ECF.

By: /s/ Jon A. Jacobson

By: /s/ Timothy W. Schulz

Service List

SECURITIES AND EXCHANGE COMMISSION

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United States District Court, Middle District of Florida

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