

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 WILLIAMS' NOTICE OF FILING
PROPOSED ORDER TO PAY HIS ATTORNEYS' FEES

Defendant MICHAEL SCOTT WILLIAMS ("Williams"), pursuant to the Court's Orders dated July 8, 2020 and August 3, 2020 [D.E. 104, 123], gives notice of filing the attached his counsels' invoices for the time billed from July 15, 2020 through May 28, attached hereto as **Exhibits A and B**, and a Proposed Order directing the Receiver to pay Williams' counsels' invoices, attached hereto as **Exhibit C**.

On July 8, 2020, the Court previously approved Williams' counsel's proposed rates and budget and modified the Asset Freeze Order [D.E. 33] to allow \$64,350 to be made available for

payment of their fees from May 27, 2020 through August 28, 2020. [D.E. 104]. On July 15, 2020, the Court directed the Receiver to pay \$40,326 of these funds to Williams' counsel for their fees during the period from May 27, 2020 through July 14, 2020, leaving \$24,024 of the amount the Court had approved to pay Williams' counsels' fees. [D.E. 123]

As evidenced by Williams' counsels' attached invoices, Williams' counsel incurred a total of \$29,779.75 in fees during the period from July 15, 2020 through August 28, 2020. *See Exhibits A and B.* Williams has advised the SEC that his attorneys have voluntarily agreed to reduce their fees by \$5,755.75 (i.e., from \$29,799.75 to \$24,024) so that their fees are consistent with budget they had presented to the Court and with the amount approved by the Court. Accordingly, the attached Proposed Order directs the Receiver to pay \$24,024 to Williams' counsel's attorneys instead of the full \$29,779.75 reflected in their invoices. *See Exhibit C.*

The SEC has advised Williams that it opposes Williams' request to pay his attorneys \$24,024. The SEC has not explained the basis of its objection.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 2, 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

v.

KINETIC INVESTMENT GROUP, LLC, et al.

CASE NO.: 8:20-cv-394

United States District Court, Middle District of Florida

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