

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

CASE NO.: 8:20-cv-00394-MSS-SPF

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.)
_____)

**PLAINTIFF’S UNOPPOSED MOTION TO EXCEED THE PAGE
LIMIT SET FORTH IN LOCAL RULE 3.01(a)**

Pursuant to Local Rule 3.01(a) and the Court’s Case Management and Scheduling Order (the “Order”) (ECF No. 88), Plaintiff Securities and Exchange Commission (the “Commission”) respectfully moves for leave to

file its reply brief in support of its motion for summary judgment in excess of 10 pages, and states:

1. The Commission's reply brief is due in this matter on Monday, April 26, 2021. *See* ECF No. 88.

2. Local Rule 3.01(a) and the Order impose a 10-page maximum for reply briefs. *See* ECF No. 88 at § II.G-H.

3. The Commission anticipates filing a reply brief that is expected to be up to 17 pages in length.

4. This matter presents a complex set of facts and legal issues that cannot adequately be addressed within the current maximum page limit. It involves conduct spanning over a five-year period and concerning one individual and seven corporate entities.

5. Furthermore, Defendant Michael Scott Williams' ("Williams") Opposition to the Commission's motion for summary judgment is just over 34 pages in length, and his declaration thereto is 51 pages in length and contains 223 numbered paragraphs. *See* ECF Nos. 221, 221-1. The additional pages are necessary to allow the Commission to adequately address the issues raised in Williams' Opposition.

WHEREFORE, the Commission respectfully requests leave to file its reply brief in support of its motion for summary judgment up to 17 pages in length.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), counsel for the Commission conferred with counsel for Williams and the Receiver, who do not oppose the requested relief.

April 22, 2021

Respectfully submitted,

By: /s/ Christine Nestor & Stephanie N. Moot

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify

that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Stephanie N. Moot
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