

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

KINETIC INVESTMENT GROUP, LLC *et al.*,

Defendants and Relief Defendants.

**NOTICE OF FILING PROPOSED ORDER TO MODIFY ASSET
FREEZE ORDER**

Pursuant to the Court's Order dated February 24, 2021 [D.E. 180], Defendant Michael Scott Williams hereby gives notice of filing the attached proposed Order on *Defendant Williams' Second Motion to Modify the Asset Freeze Order [D.E. 33] to Defend This Case* ("Second Motion") [D.E. 135]

Respectfully Submitted,

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

I HEREBY CERTIFY that on May 6, 2021, the foregoing document was filed with the Clerk of the Court using the CM/ECF system and served on all counsel of record.

By: /s/ Timothy W. Schulz

By: /s/ Jon A. Jacobson

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ORDER TO RELEASE FUNDS FOR APPROVED FEES

THIS CAUSE comes before the Court pursuant to its February 24, 2021 Order [D.E. 180] in which it unfroze \$64,500 from the funds held in escrow at ServisFirst Bank (Account No. XXXXXX-0920) (“Escrow Account”) for payment of Defendant Michael Scott Williams’ (“Williams”) attorneys’ fees and costs for the time period of January 28, 2021 through April 28, 2021 (“Approved Period”).

It is hereby **ORDERED** that funds to cover Williams’ approved defense fees and costs of \$64,500 during the Approved Period shall be released as follows:

1. The Court approves the reduced hourly rate of \$357.50/hour for each of Williams’ two attorneys, Jon A. Jacobson, Esq. and Timothy W. Schultz, Esq. (collectively, “Counsel”).

2. Counsel has provided Plaintiff and the Receiver with time records for the Approved Period that exceed \$64,500. Within three days of entry of this Order, the Receiver shall pay Counsel \$64,500 from the Escrow Account.

3. All remaining terms of the Asset Freeze Order [D.E. 33] not modified by this Order remain in place.

DONE AND ORDERED in Chambers in _____, Florida, this ____ day of _____, 2021.

UNITED STATES DISTRICT JUDGE