

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

KINETIC INVESTMENT GROUP, LLC and  
MICHAEL SCOTT WILLIAMS,

CASE NO.: 8:20-cv-394

Defendants, and

KINETIC FUNDS I, LLC,  
KCL SERVICES, LLC d/b/a LENDACY,  
SCIPPIO, LLC, LF 42, LLC, EL MORRO  
FINANCIAL GROUP, LLC, and KIH, INC.,  
f/k/a KINETIC INTERNATIONAL, LLC,

Relief Defendants.

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**RECEIVER'S UNOPPOSED MOTION FOR  
LEAVE TO EXCEED PAGE LIMIT**

Mark A. Kornfeld, Esq., as Receiver appointed over Defendant Kinetic Investment Group, LLC and Relief Defendants Kinetic Funds, LLC, KCL Services, LLC d/b/a Lendacy, Scipio, LLC, LF 42, LLC, and KIH Inc., f/k/a Kinetic International, LLC, by and through undersigned counsel and pursuant to Local Rule 3.01(a), hereby moves the Court for leave to exceed the twenty-five page limit in filing his forthcoming Motion to (i) Approve Determination and Priority of Claims, (ii) Pool Receivership Assets and Liabilities, (iii) Establish Objections Procedure, and (iv) approve Plan of Distribution (the "Claims Motion.") Given the

significant and necessary information set forth in the Claims Motion, the Receiver seeks leave to file a Claims Motion no longer than forty-five pages (excluding exhibits).

The Claims Motion represents the latest progress in the Receiver's ongoing efforts to return substantial recovered receivership assets to those claimants with allowed claims. As will be detailed in the Claims Motion, the Receiver is seeking Court approval for (i) his proposed determinations and priorities of approximately three dozen investor and creditor claims submitted during the claims process; (ii) the objection procedures for any claimants who disagree with the Receiver's proposed determinations; (iii) the pooling of all assets and liabilities of the Receivership estate to proceed with future distributions; and (iv) a proposed distribution plan in the event the Claims Motion is granted.

Local Rule 3.01(a) sets forth a 25-page limit for motions. However, the additional length of the Claims Motion is necessary given the required specificity and magnitude of the requested relief as well as to provide all interested parties – including the Court – with the Receiver's plan and procedure for moving forward. Thus, the Receiver requests leave to exceed the 25-page limitation and file a Claims Motion no longer than 45 pages. Notably, neither the Commission nor Mr. Williams oppose this request.

WHEREFORE, Mark A. Kornfeld, Esq., as Receiver appointed over Defendant Kinetic Investment Group, LLC and Relief Defendants Kinetic Funds,

LLC, KCL Services, LLC d/b/a Lendacy, Scipio, LLC, LF 42, LLC, and KIH Inc., f/k/a Kinetic International, LLC, hereby respectfully requests that the Court grant his request for leave to file a Claims Motion of no longer than 45 pages and for all such further relief as this Court deems just.

**LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), counsel for the Receiver has conferred with counsel for the Commission and Defendant Williams prior to filing this Motion and is authorized to indicate that neither the Commission nor Williams oppose the requested relief.

Respectfully submitted,

**BUCHANAN INGERSOLL & ROONEY  
PC**

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14th day of June, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to the following counsel of record:

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