

**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,  
SCIPIO, 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 MOTION FOR LEAVE TO FILE REPLY  
IN SUPPORT OF “MOTION TO APPROVE PRIVATE SALE OF PUERTO RICO  
REAL PROPERTIES AND PARKING SPACES AND PROPOSED PUBLICATION,  
MARKETING, AND OVERBID PROCEDURES ASSOCIATED WITH THE SALE OF  
THE REAL PROPERTIES” [DOC. 275]**

COMES NOW, Mark A. Kornfeld, Court-Appointed Receiver of Defendant Kinetic Investment Group, LLC and Relief Defendants 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 (“RECEIVER”), by and through the undersigned counsel and pursuant to Middle District of Florida Local Rule 3.01, hereby moves this Court for leave to file a seven-page reply to Defendant, MICHAEL SCOTT WILLIAM’s (“WILLIAMS”), Response in Opposition to Receiver’s Motion to Approve Private Sale of Puerto Rico Real Properties and Parking Spaces and Proposed Publication, Marketing, and Overbid Procedures Associated with the Sale of the Real

Properties (the “Opposition,” Doc. 277) within seven (7) days after the Court’s Order granting this Motion. A reply is necessary to address WILLIAMS’ argument including that he has committed no wrongdoing, that the RECEIVER has collected sufficient funds to repay investors, and that the RECEIVER’s selling of the property is premature. If leave is granted, RECEIVER will provide additional factual details and legal grounds addressing the misstatements or arguments discussed in WILLIAMS’ Opposition motion.

**WHEREFORE**, Mark A. Kornfeld, Court-Appointed Receiver of Defendant Kinetic Investment Group, LLC and Relief Defendants 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, respectfully moves this Court for leave to file a seven-page Reply to WILLIAMS’ Opposition within seven (7) days of the Court’s Order.

**LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), the undersigned certifies that counsel for the Receiver conferred with counsel for the Commission and counsel for Defendant Michael Williams prior to filing this Motion and that both counsel do not oppose the relief requested in this motion.

**BUCHANAN INGERSOLL & ROONEY PC**

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*Attorneys for Receiver Mark A. Kornfeld*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2022, 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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