

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 20-cv-21964-CMA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TCA FUND MANAGEMENT GROUP, CORP., a Florida  
company, et al.,

Defendants.

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**RECEIVER'S THIRD UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE LIQUIDATION PLAN**

COMES NOW, Jonathan E. Perlman, Esq., as court-appointed Receiver ("Receiver") of the Receivership Entities,<sup>1</sup> by and through undersigned counsel, hereby files this Third Unopposed Motion for Extension of Time to File Liquidation Plan ("Motion") and accordingly states as follows:

1. On May 11, 2020, the Securities and Exchange Commission ("SEC") filed its Complaint for Injunctive Relief against TCA Fund Management Group, Corp. ("FMGC"), TCA Global Credit Fund GP, LTD. ("GP"), ("Receivership Defendants"), and TCA Global Credit Fund, LP ("Feeder LP"), TCA Global Credit Fund, LTD. ("Feeder Ltd."), and TCA Global Credit Master Fund, LP ("Master Fund") ("Relief Defendants") (collectively, "Defendants").

[ECF No. 1].

2. The SEC also filed an Expedited Motion for Appointment of Receiver. [ECF No. 3].

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<sup>1</sup> All terms not specifically defined herein have the meaning ascribed to them in the SEC's Motion for Appointment of Receiver [ECF No. 3] and the Court's Appointment Order [ECF No. 5], and the Court's First Expansion Order [ECF No. 16].

3. On the same day, the Court granted the motion and appointed Jonathan E. Perlman, Esq., of the law firm Genovese Joblove & Battista, P.A. (“GJB”), as permanent Receiver over the Receivership Entities [ECF No. 5] (“Appointment Order”).

4. Pursuant to the Appointment Order, the Receiver “is authorized, empowered and directed to develop a plan for the fair, reasonable, and efficient recovery and liquidation of all remaining, recovered, and recoverable Receivership Property (the “Liquidation Plan”).” [*Id.* at § XIII ¶ 46].

5. The Appointment Order required the Receiver to file the Liquidation Plan in this case on or before August 7, 2020. [*Id.* at ¶ 47].

6. On July 27, 2020, this Court granted the Receiver an extension of time, through and including November 5, 2020, to file the Liquidation Plan. [ECF No. 44].

7. Thereafter, after discussions with the SEC, the Receiver sought and was granted an additional extension of time to file the Liquidation Plan through and including February 5, 2021. [ECF No. 69].

8. However, due to the amount and varied nature of the assets of the Receivership Estate, the Receiver requires additional time to prepare the Liquidation Plan.

9. Counsel for the Receiver has conferred with the counsel for the SEC, who has no objection to this relief sought herein.

10. Accordingly, the Receiver requests an extension of time through and including June 15, 2021 to file the Liquidation Plan.

WHEREFORE, Receiver, Jonathan E. Perlman, by and through his undersigned counsel, respectfully requests that this Honorable Court grant him an extension of time to file the Liquidation Plan through and including June 15, 2021, and for such other relief as this Court deems just and proper.

**S.D. Fla. L.R. 7.1(A)(3) CERTIFICATE OF CONFERENCE**

Undersigned counsel hereby certifies that he conferred with counsel for the SEC on January 28, 2021, via phone regarding the requested relief and is authorized to represent that the SEC has no objection to the relief sought herein.

GENOVESE JOBLOVE & BATTISTA, P.A.  
*Attorneys for Jonathan E. Perlman, Receiver*  
100 Southeast 2nd Street, Suite 4400  
Miami, Florida 33131  
Telephone: (305) 349-2300  
Facsimile: (305) 349-2310

By: /s/ Gregory M. Garno  
Gregory M. Garno, Esq.  
Florida Bar No. 87505  
[ggarno@gjb.law](mailto:ggarno@gjb.law)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was served via CM/ECF Notification and/or U.S. Mail to all parties and notification of such filing to all CM/ECF participants in this case on the 29th day of January, 2021.

/s/ Gregory M. Garno  
Attorney

**SERVICE LIST**

***Securities and Exchange Commission v. TCA Fund Management Group Corp., et al.***  
**Case No. 20-Civ-21964-CMA**

Jonathan E. Perlman, Esq.  
[jperlman@gjb-law.com](mailto:jperlman@gjb-law.com)  
*Receiver for the Receivership Entities*

Gregory M. Garno, Esq.  
[ggarno@gjb-law.com](mailto:ggarno@gjb-law.com)  
Irina R. Sadovnic, Esq.  
[isadovnic@gjb-law.com](mailto:isadovnic@gjb-law.com)  
GENOVESE JOBLOVE & BATTISTA, P.A.  
100 Southeast 2nd Street, Suite 4400  
Miami, Florida 33131  
Telephone: (305) 349-2300  
Facsimile: (305) 349-2310  
*Attorneys for Jonathan E. Perlman, Receiver*

Andrew O. Schiff  
[schiffa@sec.gov](mailto:schiffa@sec.gov)  
Stephanie N. Moot  
[moots@sec.gov](mailto:moots@sec.gov)  
*Attorneys for Plaintiff Securities and Exchange Commission*  
801 Brickell Avenue, Suite 1950  
Miami, Florida 33131  
Telephone: (305) 982-6300  
Facsimile: (305) 536-4146

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**ORDER**

THIS CAUSE came before the Court upon Receiver, Jonathan E. Perlman's Third Unopposed Motion for Extension of Time to File Liquidation Plan (the "Motion"). Being fully advised, it is hereby

ORDERED AND ADJUDGED that the Motion is GRANTED. The Receiver shall file the Liquidation Plan on or before June 15, 2021.

DONE AND ORDERED in Miami, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2021.

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CECILIA M. ALTONAGA  
UNITED STATES DISTRICT JUDGE

*cc: Counsel of Record*