

No. 22-13412-B

**In the United States Court of Appeals
for the Eleventh Circuit**

United States Securities and Exchange Commission and
Jonathan E. Perlman, Court-Appointed Receiver,
Plaintiff and Appellees,

v.

Eleanor Fisher and Tammy Wu, in their capacities as Foreign Representatives of
Relief Defendant, TCA Global Credit Fund, Ltd.,
Petitioners/Appellants

Appeal from the United States District Court for the
Southern District of Florida
No. 20-21964-Altonaga/Goodman

**APPELLEE JONATHAN E. PERLMAN'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE RESPONSE TO
APPELLANTS' INITIAL MERITS BRIEFING**

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CERTIFICATE OF INTERESTED PERSONS

Pursuant to Eleventh Circuit Rule 26.1-1, Appellee, Jonathan E. Perlman, as Receiver (the “Receiver”), submits the following list of all persons and entities known to the Receiver to have an interest in the outcome of this appeal:

1. Altonaga, Hon. Cecilia M., United States District Judge (S.D. Fla)
2. Avila, Rodriguez, Hernandez, Mena & Ferri, Attorneys for Respondent, Ocean Bank
3. AW Exports Pty Ltd, Claimant
4. Baker & McKenzie LLP, Attorneys for Appellant
5. Banque Pictet & CIE S.A., Petitioner in Cayman Islands Liquidation Proceeding
6. Bast Amron LLP, Attorneys for Armand Zohari, Tritium Fund, Hsueh-Feng Tseng, and Fide Funds Growth
7. Bast, Jeffrey P., Esq., Attorney for Armand Zohari, Tritium Fund, Hsueh-Feng Tseng, and Fide Funds Growth
8. Battista, Paul J., Esq., Attorney for Appellee Jonathan E. Perlman, Receiver
9. Benjamin, Todd, Claimant
10. Berger, Evan B., Counsel for claimants David Manning, Paycation Travel, Inc., and Xstream Travel, Inc.
11. Berger & Poliakoff, P.A., Counsel for Claimants David Manning, Paycation Travel, Inc., and Xstream Travel, Inc.
12. Berkovitz, Dan M., Counsel for Appellee Securities and Exchange Commission

13. Bloom, Mark D., Esq., Attorney for Appellants
14. Blum, W. Barry, Esq., Attorney for Appellee Jonathan E. Perlman, Receiver
15. Bradylyons, Morgan, Counsel for Appellee Securities and Exchange Commission
16. Broxom, Warwick, Claimant
17. Caesarea Medical Electronics Holding (2000) Ltd., Claimant
18. Cahill Gordon & Reindel LLP, Attorneys for Credit Suisse Claritas, LLC, Cayman Islands Counsel for Appellants Clearstream Banking S.A., Limited Objector
19. Clearstream Banking S.A., Objector
20. Claritas, LLC, Counsel for Appellants
21. Conley, Michael A., Counsel for Appellee Securities and Exchange Commission
22. Credit Suisse, Limited Objector
23. Cuccia II, Richard A., Esq., Attorney for Paycation Travel, Inc., Xstream Travel, Inc., and David Manning
24. Cuccia Wilson, PLLC, Attorneys for Paycation Travel, Inc., Xstream Travel, Inc., and David Manning
25. Dodd, John R., Esq., Attorney for Appellant
26. Dorchak, Joshua, Esq., Attorney for Clearstream Banking S.A. EY Cayman Ltd.
27. EY Cayman Ltd.
28. Fide Funds Growth

29. Fisher, Eleanor, Foreign Representative of Relief Defendant TCA Global Credit Fund, Ltd.
30. Friedman, Michael A., Esq., Counsel for Appellee Jonathan E. Perlman
31. Fu, Tammy, Foreign Representative of Relief Defendant TCA Global Credit Fund, Ltd.
32. Fulton, Andrew, IV, Esq., Attorney for Lease Corporation of America
33. Garno, Gregory M., Esq., Attorney for Appellee Jonathan E. Perlman, Receiver
34. Venable LLP, Attorneys for Appellee Jonathan E. Perlman, Receiver
35. Genovese, John H., Esq., Attorney for Appellee Jonathan E. Perlman, Receiver
36. Hall, Jason, Esq. Attorney for Credit Suisse
37. Halsey, Brett M., Esq., Counsel for Appellee Jonathan E. Perlman
38. Harmon, Heather L., Esq., Counsel for Appellee Jonathan E. Perlman
39. Hill, Ezekiel L., Esq., Counsel for Appellee Securities and Exchange Commission
40. Jacobs, Eric D., Esq., Counsel for Appellee Jonathan E. Perlman
41. Kaplan Saunders Valente & Beninati, LLP, Attorneys for AW Exports Pty Ltd, Warwick Broxom, and Jonathan James Kaufman
42. Kaufman, Jonathan James, Claimant
43. Kellogg, Jason Kenneth, Esq., Attorney for Todd Benjamin International, Ltd. and Todd Benjamin
44. Kelley & Fulton, P.A., Attorneys for Claimant, Lease Corporation of America Lease Corporation of America, Claimant

45. Kleckley, Thaddeus R., Esq., Counsel for Appellee Jonathan E. Perlman
46. Leggett, Jaime B., Esq., Attorney for Armand Zohari, Tritium Fund, Hsueh-Feng Tseng, and Fide Funds Growth
47. Levine Kellogg Lehman Schneider & Grossman, Counsel for Todd Benjamin International, Ltd. and Todd Benjamin
48. Manning, David, Claimant
49. McIntosh, Elizabeth G., Esq., Attorney for Appellee Jonathan E. Perlman, Receiver
50. Moot, Stephanie N., Esq., Attorney for Securities and Exchange Commission
51. Mora, Martha Rose, Esq., Attorney for Respondent, Ocean Bank
52. Morgan, Lewis & Bockius LLP, Attorneys for Clearstream Banking S.A.
53. Ocean Bank, Non-Party Respondent
54. Paycation Travel, Inc., Claimant
55. Pearson, Katharine Lucy Bladen, Esq., Cayman Islands Attorney for Appellants
56. Perlman, Jonathan, E., Receiver, Appellee
57. Roldan Cora, Javier A., Esq., Attorney for Clearstream Banking S.A.
58. TCA Fund Management Group Corp., Defendant, Receivership Entity
59. TCA Global Credit Fund GP, Ltd., Defendant, Receivership Entity
60. TCA Global Credit Fund, L.P., Relief Defendant, Receivership Entity

61. TCA Global Credit Fund, Ltd., Relief Defendant, Receivership Entity
62. TCA Global Credit Master Fund, L.P., Relief Defendant, Receivership Entity
63. TCA Global Lending Corp., Receivership Entity
64. Todd Benjamin International, Ltd., Claimant
65. Tritium Fund, Claimant
66. Tseng, Hsueh-Feng, Claimant
67. Todd Benjamin International, Ltd., Claimant
68. United States Securities and Exchange Commission, Plaintiff
69. Valente, Charles A., Esq., Attorney for AW Exports Pty Ltd, Warwick Broxom, and Jonathan James Kaufman
70. van de Linde, Peter, Claimant
71. Xstream Travel, Inc., Claimant
72. Zohari, Armand, Claimant

This Certificate of Interested Persons does not include all persons and entities who may be claimants or trade creditors in the receivership proceeding.

CORPORATE DISCLOSURE STATEMENT

In accordance with Eleventh Circuit Rule 26.1-3(b), the Receiver certifies that no publicly traded company or corporation has an interest in the outcome of this appeal.

ARGUMENT

Pursuant to Federal Rule of Appellate Procedure 31, and Eleventh Circuit Rule 31-2(d), Appellee Jonathan E. Perlman respectfully requests a 7-day extension of time to file his Brief in Response to Appellants Initial Brief and Appendix in Support of his Initial Brief: through and including May 17, 2023 for his Brief in Response and May 24, 2023 for his Appendix. In support of this unopposed motion, Appellee states as follows:

1. This appeal arises out of the District Court's August 4, 2022 Order granting the Receiver's Motion for Approval of Distribution Plan and First Interim Distribution.
2. Appellee's Brief in Response is presently due on May 10, 2023 and the Appendix on May 17, 2023.
3. The Receiver requires additional time to complete his Brief in Response and prepare his Appendix in Support.
4. Undersigned counsel are the attorneys with principal responsibility for the preparation of the Brief in Response and Appendix, and are heavily engaged with other active matters with proximate due dates.
5. Throughout the period of time since the present deadline for the filing of the Brief in Response was established by this Court, undersigned counsel have had several emergent matters arise in active and pending litigation that have

occupied the lawyers involved in the preparation to the Receiver's Brief in Response.

6. Moreover, Appellants filed a similar motion for a second extension of time, seeking a fourteen (14) day extension (Dkt. No. 31) which was granted by this Court on February 13, 2023 (Dkt. No. 32).

7. Barring unforeseen circumstances, this Motion requesting an additional seven (7) days, through and including March 17, 2023, shall constitute Appellee's final request for enlargement of the time period for filing his Brief in Response.

8. This motion is made in good faith and not for the purpose of delay. No party, including the Appellants, will be prejudiced by the requested extension.

9. Counsel for Appellants and the SEC have indicated that they do not oppose the relief sought in the instant motion.

WHEREFORE, for good cause and compelling reasons having been shown, Appellee Jonathan E. Perlman respectfully requests that this Court grant a 7-day extension of time for the filing of his Brief in Response through and including May 17, 2023 and May 24, 2023 for his Appendix in Support.

Respectfully submitted this 10th day of May, 2023.

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CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that this motion complies with the typeface requirements of FED. R. APP. P. 32(a)(5) and the type style requirements of FED. R. APP. P. 32(a)(6).

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By: /s/ Greg M. Garno
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