

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

**CASE NO. 20-21964-CIV-ALTONAGA**

**SECURITIES & EXCHANGE  
COMMISSION,**

Plaintiff,

v.

**TCA FUND MANAGEMENT  
GROUP CORP., et al.,**

Defendants.

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**ORDER**

**THIS CAUSE** came before the Court upon Receiver, Jonathan E. Perlman's Motion to Amend Preliminary Approval Order [ECF No. 489], filed on January 13, 2025.

Being fully advised, it is

**ORDERED AND ADJUDGED** that:

1. Receiver's Motion to Amend Preliminary Approval Order [ECF No. 489] is **GRANTED**.

2. Paragraph 4 of the Court's December 23, 2024 Order [ECF No. 486] is **AMENDED** as follows:

**Objection Deadline; Objections and Appearances at the Final Approval Hearing.**

Any person who objects to the Motion or any of the relief related to any of the foregoing, must file an objection, in writing, with the Court within 60 days after the entry of this Order. All objections filed with the Court must:

- a. Contain the objector's name, address, email address, and telephone number;

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- b. Provide the identity of all counsel representing the objector who will appear at the Final Approval Hearing;
- c. Identify of all counsel who represent the objector, including any former or current counsel who previously represented the objector and may be entitled to compensation for any reason related to the objection to the Settlement or the fee application;
- d. List the number of times in which the objector has objected to a receivership or class action settlement within the five (5) years preceding the date on which the objector files the objection;
- e. List the number of times in which the objector's counsel and/or counsel's law firm have objected to a receivership or class action settlement within the five (5) years preceding the date that the objector files the objection, the caption of each case in which the counsel or the firm has made such objections, and a copy of any orders related to or ruling upon counsel's or the firm's prior such objections that were issued by the trial and appellate courts in each listed case;
- f. Attach any and all agreements that relate to the objection or the process of objecting, whether written or verbal, between the objector or objector's counsel and any other person or entity;
- g. State, in detail, all factual and legal grounds for the objection;
- h. Attach any document the Court should review in considering the objection and ruling on the Motion;
- i. Include a list of any persons who will be called to testify in support of the objection;
- j. Include a statement confirming whether the objector intends to personally appear and/or testify; and
- k. Be signed by the objector (an attorney's signature is not sufficient).

Subject to the discretion of this Court, no person will be permitted to appear at the Final Approval Hearing without first filing a written objection and requesting to appear at the hearing in accordance with the provisions of this paragraph. Copies of any objections filed must be served by email and regular U.S. mail on:

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The Receiver:

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Class Plaintiffs:

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Marcelo Diaz-Cortes  
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-and-

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Any person failing to file an objection by the time and in the manner set forth in this paragraph will be deemed to have waived the right to object (including any right to appeal) and to appear at the Final Approval Hearing, and such person will be forever barred from raising

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such objection in this action or any other action or proceeding, subject to the discretion of this Court.

**DONE AND ORDERED** in Miami, Florida, this 13th day of January, 2025.

  
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**CECILIA M. ALTONAGA**  
**CHIEF UNITED STATES DISTRICT JUDGE**

cc: counsel of record