

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

v.

EQUITYBUILD, INC., EQUITYBUILD
FINANCE, LLC, JEROME H. COHEN, and
SHAUN D. COHEN,

Defendants.

Civil Action No. 1:18-cv-5587

Judge John Z. Lee

Magistrate Judge Young B. Kim

AGREED MOTION FOR EXTENSION

Claimant BC57, LLC (“BC57”) respectfully files this Agreed Motion for an extension, until Monday, March 14, for all Group 1 claimants to file their responsive position statements. In support thereof, BC57 states as follows:

1. On February 24, 2022, the Receiver filed a motion for extension, requesting the Court grant him leave to file his position statement on Monday, February 28, 2022, rather than on February 24, 2022, when it otherwise would have been due. (Doc. 1196)

2. On February 25, BC57 filed a response to the Receiver’s motion, requesting that to the extent that the Receiver were allowed until February 28 to file his position statement, that BC57 be granted a commensurate extension to file its responsive position statement – which would extend the deadline from March 10, 2022 to March 14, 2022. (Doc. 1197)

3. The Court has not ruled on the Receiver’s motion or BC57’s related request. But the Receiver did file his position statement on February 28, 2022, the extended date for which he had moved the Court. (Doc. 1201)

4. Therefore, BC57 respectfully requests that responsive position statements of all Group 1 claimants and of the SEC be extended from March 10, 2022, to March 14, 2022

5. Undersigned counsel has conferred with counsel for the SEC, for the Receiver, and for “Certain Individual Lenders” (*see* Doc. 1151), all of whom agree to the relief sought in this Motion.

WHEREFORE, Claimant BC57 LLC respectfully requests that the Court enter an order that extending the deadline for all Group 1 claimants and the SEC to file responsive position statements from March 10, 2022, to March 14, 2022.

Respectfully submitted,

/s/ Todd Gale
One of the Attorneys for Claimant,
BC57, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I caused the foregoing Agreed Motion for Extension to be electronically filed with the Clerk of Court through the Court's CM/ECF system, which sent electronic notification of such filing to all parties of record, and e-mailed to ebgroup1service@rdaplawn.net, which is designed to send electronic notification of such filing to all parties involved in Group 1.

/s/ Todd Gale

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