

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

_____ )	
UNITED STATES SECURITIES )	
AND EXCHANGE COMMISSION, )	
)	
Plaintiff, )	Civil Action No. 18-cv-5587
)	
v. )	Hon. John Z. Lee
)	
EQUITYBUILD, INC., EQUITYBUILD )	Magistrate Judge Young B. Kim
FINANCE, LLC, JEROME H. COHEN, )	
and SHAUN D. COHEN, )	
)	
Defendants. )	
_____ )	

**RECEIVER’S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Kevin B. Duff, as the receiver (“Receiver”) for the Estate of Defendants EquityBuild, Inc., EquityBuild Finance, LLC, their affiliates, and the affiliate entities of Defendants Jerome Cohen and Shaun Cohen, respectfully requests that this Court enter an order granting him an additional two business days to file the Receiver’s reply brief to BC57 LLC’s Responsive Statement. (Dkt. No. 1217). In support of his Motion, the Receiver states as follows:

1. On January 21, 2022, an order was entered amending Order Modifying Group 1 Schedule (Dkt. No. 1091) to allow the Receiver to file his reply brief that responds to any arguments BC57 may raise in its Responsive Statement on or before March 24, 2022, which was a date fourteen days after BC57 scheduled submission date of March 10, 2022. (See Dkt. No. 1135)

2. The deadlines set by Order Modifying Group 1 Schedule (Dkt. No. 1091) were subsequently extended by this Court to allow (a) Receiver’s submission regarding claims to be filed on or before February 28, 2022 instead of February 24, 2022 (Dkt. No. 1212) and (b)

claimants' responsive statements to be filed on or before March 14, 2022 instead of March 10, 2022 (Dkt. No. 1211).

3. On March 14, 2022, BC57 submitted its 52-page Responsive Statement, including its response on the Receiver's avoidance claims. (Dkt. No. 1217)

4. The Receiver will require the full fourteen days for the submission of his reply brief in response to the issues raised in BC57 Responsive Statement on the avoidance issues. Allowing for the full fourteen days would have the brief due on March 28, 2022, two business days after the current date set of March 24, 2022, and a total of four additional calendar days.

5. Counsel for the Receiver has notified counsel for BC57 of this request, and counsel for BC57 has no objection.

WHEREFORE, the Receiver requests an extension of time from March 24, 2022 to March 28, 2022 to file his reply submission in regards to the avoidance issues.

Dated: March 22, 2022

Respectfully submitted,

s/ Michael Rachlis

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*Attorneys for Kevin B. Duff, Receiver*

**CERTIFICATE OF SERVICE**

I hereby certify that I provided service of the foregoing Unopposed Motion for Extension, via the Court's CM/ECF system, to all counsel of record on March 22, 2022.

/s/ Michael Rachlis \_\_\_\_\_

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