

**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

CORRECTED MOTION FOR EXTENSION FOR JOINT STATUS REPORT
(UNOPPOSED)

Claimant BC57, LLC (“BC57”) respectfully files this unopposed Corrected Motion for an extension, until Tuesday, March 29, 2022, for the parties to file their next Joint Status Report. In support thereof, BC57 states as follows:

1. On January 25, 2022, a Joint Status Report was filed by counsel for the Receiver, the Securities and Exchange Commission (“SEC”), certain Group 1 claimants previously identified to this Court as Investor-Lenders, and BC57. (Doc. 1139) Two days later, the Court, having reviewed that status report, directed the parties to file a joint status report on March 25, 2022. (Doc. 1148) At that time, all briefing related to Group 1 lien priority issues and the Receiver’s avoidance claim was scheduled to be completed by March 24, 2022. (*See* Doc. 1091)

2. 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)

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

4. The Court granted both the Receiver's motion and BC57's related request. (Doc. 1211 and Doc. 1212)

5. On March 22, 2022, the Receiver filed an unopposed motion for extension of time, seeking to file his reply brief regarding his avoidance claims on Monday, March 28, 2022, rather than Thursday, March 24, 2022. (Doc. 1221) As of the time of filing this unopposed Motion, the Court has not ruled on the Receiver's motion for an extension.

6. BC57 believes that it makes the most sense for the parties to see the Receiver's reply brief before reporting to the Court for this Joint Status Report.

7. Therefore, BC57 respectfully requests that the filing date for the Joint Status Report be extended from Friday, March 25, 2022, to Tuesday, March 29, 2022.

8. Undersigned counsel has conferred with counsel for the SEC, for the Receiver, and for "Certain Individual Lenders" (*see* Doc. 1151), none of whom has an objection to the relief sought in this Motion.

WHEREFORE, Claimant BC57 LLC respectfully requests that the Court enter an order extending the filing date for the Joint Status Report from March 25, 2022, to March 29, 2022.

Dated: March 24, 2022

BC57, LLC

/s/ David E. Hart

David E. Hart

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CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2022, I caused the foregoing MOTION FOR EXTENSION FOR JOINT STATUS REPORT (UNOPPOSED) 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.

/s/ Todd Gale

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