

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

	)	
<b>UNITED STATES SECURITIES</b>	)	
<b>AND EXCHANGE COMMISSION,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 18-cv-5587</b>
	)	
<b>v.</b>	)	<b>Honorable Manish S. Shah</b>
	)	
<b>EQUITYBUILD, INC., EQUITYBUILD</b>	)	<b>Magistrate Judge Young B. Kim</b>
<b>FINANCE, LLC, JEROME H. COHEN,</b>	)	
<b>and SHAUN D. COHEN,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**MOTION FOR PARTIAL EXTENSION OF GROUP 6 DEADLINE**

Receiver Kevin B. Duff respectfully requests that the Court extend the deadline for the Receiver’s Group 6 submission *only with respect to two of the properties in that group*—6217-27 S Dorchester Avenue (Property 68) and 1414 E 62nd Place (Property 8). The Receiver has made a proposal regarding the potential resolution of the claims asserting an interest in those properties to counsel for the institutional lender claimant (Citibank NA) and counsel for certain of the investor lenders claiming an interest in properties, and has been advised that claimants need an additional two weeks to consider the proposal. In support of his motion, the Receiver states as follows:

1. On April 1, 2024, the Court entered orders setting schedules for the summary claims process proceedings for Groups 6. (Dkt. 1637) This schedule included an August 27, 2024 deadline for the Receiver’s Recommendations and Disclosure of Avoidance Claims. (*Id.*)
  
2. The Receiver is prepared to file his Group 6 submission on August 27, 2024. However, the Receiver is involved in ongoing discussions with certain of the claimants regarding a potential agreed resolution of the claims against Property 8 and Property 68, and counsel for

institutional lender claimant Citibank NA has requested an additional two week to consider the Receiver's proposal.

3. The Receiver believes that the requested extension is reasonable, that a resolution of these claims would save time and resources for the receivership, impacted claimants and the Court, and that submission of the Receiver's recommendations with respect to these two properties at this time could hinder the ongoing discussions.

4. The Receiver does not believe that the requested extension will impact the claims process with respect to any other properties or Groups, and the Receiver will file his Group 6 submission with respect to the remaining 13 properties in Group 6 on August 27, 2024, as scheduled.

WHEREFORE, the Receiver respectfully requests that the Court enter an order extending for two weeks, until September 10, 2024, the deadline for the filing of the Receiver's Recommendations and Disclosure of Avoidance Claims with respect to Group 6 Properties 8 and 68 only, with a schedule for remaining claims process deadlines pertaining to those two properties to be set by the Court.

Dated: August 23, 2024

Kevin B. Duff, Receiver

By: /s/ Michael Rachlis  
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