

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

CASE NO.: 23-24903-CIV-JB

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RISHI KAPOOR, et al.,

Defendants.

**RECEIVER'S MOTION TO EXTEND TIME TO REPLY TO KAPOOR'S
OBJECTIONS TO AUCTION SALE OF PERSONAL PROPERTY**

Bernice C. Lee, as Receiver (“Receiver”) over the companies¹ listed herein (collectively, the “Receivership Defendants”) in this action, moves for a one-day extension through Monday April 15, 2024 to submit a reply to Defendant Rishi Kapoor’s Objections to Auctioning Rishi Kapoor’s Personal Items, ECF No. [117] (“Objections”), and in support states:

1. On April 5, 2024, Kapoor filed the Objections in accordance with the Court’s Order Granting Receiver’s Motion to Approve Employment of Auctioneer and Auction Sale of Personal Property ECF No. [109]. By this motion, the Receiver requests a one-day extension to submit a reply to the Objections through Monday, April 15, 2024, pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule 7.1(a)(J).

¹ The Receivership Defendants include: Location Ventures, LL, URBIN, LLC, Patriots United, LLC; Location Properties, LLC; Location Development, LLC; Location Capital, LLC; Location Ventures Resources, LLC; Location Equity Holdings, LLC; Location GP Sponsor, LLC; 515 Valencia Sponsor, LLC; LV Montana Sponsor, LLC; URBIN Founders Group, LLC; URBIN CG Sponsor, LLC; 515 Valencia Partners, LLC; LV Montana Phase I, LLC; Stewart Grove 1, LLC; Stewart Grove 2, LLC; Location Zamora Parent, LLC; URBIN Coral Gables Partners, LLC; URBIN Coconut Grove Partners, LLC; URBIN Miami Beach Partners, LLC; and URBIN Miami Beach II Phase 1, LLC.

2. As good cause for the extension, the Receiver submits that the parties expect to reach a resolution of the Objections and to submit a proposed agreed order resolving same. The Receiver requests the extension to permit time to submit such a proposed order, or to submit a reply in the unexpected event one is necessary.

3. This extension will not prejudice any party and is not requested for any improper purpose or delay. All affected parties consent to the requested extension.

CERTIFICATION OF CONFERENCE WITH COUNSEL

Counsel for defendant Rishi Kapoor has informed undersigned counsel that he has no opposition to the relief requested herein.

Respectfully submitted,

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By: /s/ David L. Rosendorf
David L. Rosendorf
Florida Bar No. 996823

Counsel for Bernice C. Lee, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via CM/ECF upon all counsel of record this 12th day of April, 2024.

By: /s/ David L. Rosendorf
David L. Rosendorf

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ORDER

THIS CAUSE came before the Court upon the Receiver's Motion to Extend Time to Reply to Kapoor's Objections to Auction Sale of Personal Property [ECF No. ____]. Being fully advised, it is

ORDERED AND ADJUDGED that the Motion is **GRANTED**. The time for the Receiver to file a reply to Defendant Rishi Kapoor's Objections to Auctioning Rishi Kapoor's Personal Items is extended through April 15, 2024.

DONE AND ORDERED in Miami, Florida this ____ day of April, 2024.

JACQUELINE BECERRA
UNITED STATES DISTRICT JUDGE

cc: counsel of record