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Attorneys for Receiver for Defendants AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT MANAGEMENT, LLC

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF OREGON

## PORTLAND DIVISION

# SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC; AEQUITAS HOLDINGS, LLC; AEQUITAS COMMERCIAL FINANCE, LLC; AEQUITAS CAPITAL MANAGEMENT, INC.; AEQUITAS INVESTMENT MANAGEMENT, LLC; ROBERT J. JESENIK; BRIAN A. OLIVER; and N. SCOTT GILLIS, No. 3:16-cv-00438-JR

THIRD STIPULATION TO EXTEND RESPONSE AND REPLY DEADLINES -RECEIVER'S MOTION TO ENFORCE RECEIVERSHIP INJUNCTION AND RECEIVERSHIP'S CLASSIFICATION OF THE AMERICAN STUDENT FINANCIAL GROUP, INC. CLAIM [DKT. NO. 923]

Defendants.

The Aequitas Receiver, Ronald F. Greenspan, and the Tango Delta Financial Liquidating

Trustee, Larry S. Hyman, by and through their respective counsel stipulate as follows:

Page 1 - STIPULATION TO EXTEND RESPONSE DEADLINE [DKT. NO. 923] SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law Pacwest Center 1211 SW 5th Ave., Suite 1900 Portland, OR 97204

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#### Case 3:16-cv-00438-JR Document 964 Filed 03/25/22 Page 2 of 2

1. The Receiver and the Liquidating Trustee request that the Receiver's Motion To Enforce Receivership Injunction and Receivership's Classification of the American Student Financial Group, Inc. Claim (the "Motion") [Dkt. No. 923] be taken off the April 18, 2022 under advisement calendar, subject to being re-calendared as the Court determines after the extended response and reply deadlines.

2. The Receiver and the Liquidating Trustee stipulate to extend the Liquidating Trustee's response deadline from March 25, 2022 to April 1, 2022 and extend the Receiver's reply deadline from April 15, 2022 to April 22, 2022, without prejudice to either party to seek any further extension of the briefing deadlines.

**IT IS SO STIPULATED** this 25th day of March, 2022.

#### SCHWABE WILLIAMSON & WYATT PC

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Attorneys for Receiver and Receivership Entity

By: <u>s/ Susan S. Ford</u> Susan S. Ford, OSB #842203 Email: <u>sford@sussmanshank.com</u> Telephone: 503.227.1111

## PULMAN, CAPPUCCIO & PULLEN, LLP

By: <u>s/ Randall A. Pulman</u> Randall A. Pulman (TSB No. 16393250) (Admission *pro hac vice* pending) <u>rpulman@pulmanlaw.com</u> Telephone: 210.222.9494 *Attorneys for the Tango Delta Financial, Inc. Liquidating Trust and Liquidating Trustee* 

Page 2 - STIPULATION TO EXTEND RESPONSE DEADLINE [DKT. NO. 923] SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law Pacwest Center 1211 SW 5th Ave., Suite 1900 Portland, OR 97204 Telephone: 503.222.9981 Fax: 503.796.2900

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