

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

APPEAL CASE NO.: 12-13436-EE, 12-14073-EE

JONATHAN E. PERLMAN, ESQ.,
as court-appointed Receiver of
Creative Capital Consortium, LLC,
et al.,

Appellant,

v.

BANK OF AMERICA, N.A.,

Appellee.

**APPELLANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Appellate Procedure 26.1 and 11th Circuit Rule 26.1-1, Appellant, Jonathan E. Perlman, Esq., hereby files his Certificate of Interested Person and Corporate Disclosure Statement.

A Creative Capital Concept\$, LLC – Receivership Entity

BAC North America Holding Company

BANA Holding Corporation

Bank of America, N.A., Appellee

Bank of America Corporation

Blum, W. Barry - counsel for Appellant

Cimo, David, - counsel for Appellant

Contreras-Martinez, Carmen. – counsel for Appellant

Creative Capital Consortium, LLC – Receivership Entity

Culleiton, Joseph E. – counsel for Appellee

G\$Trade Financial, Inc. – Receivership Entity

Genovese Joblove & Battista, P.A. - counsel for Appellant

Gonzalez, Juan A. – counsel for Appellee

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

Hackett, Mary J. - counsel for Appellee

Hopkins, James M. – United States Magistrate Judge

Hurley, Daniel T.K. - the Honorable District Court Judge

Josephs Jack, P.A. – counsel for Appellant, predecessor to The Joseph
Law Firm

Josephs, Michael R. - counsel for Appellant

Kaufman, Dora Faye – counsel for Appellee

Lemoie, David - counsel for Appellant

Liebler, Gonzalez & Portuondo, P.A.- counsel for Appellee

NB Holdings Corporation

Perlman, Jonathan E.- Appellant (court-appointed Receiver)

Pickens, Dustin N. - counsel for Appellee

Reed Smith, LLP – counsel for Appellee

Reverse Auto Loan, LLC – Receivership Entity

Root, Gretchen Wood Ruff – counsel for Appellee

The Dream Makers Capital Investments, LLC – Receivership Entity

The Josephs Law Firm – counsel for Appellant

United Investment Club, LLC –Receivership Entity

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

Unity Entertainment Group, Inc. – Receivership Entity

Watterson, Kim M. – counsel for Appellee

Wealth Builders Circle, LLC – Receivership Entity

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

**APPELLANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY BRIEF**

Appellant, Jonathan E. Perlman, Esq., as Court-Appointed Receiver, by and through undersigned counsel, and pursuant to Fed. R. App. P. 26(b) and 11th Cir. R. 26-1, hereby respectfully moves the Court to grant Appellant an extension of time in which to file the Appellant’s reply to Appellee’s Brief in this Court; and for good cause would respectfully show:

1. The Appellee filed its Response Brief on February 8, 2013.
2. The Appellant’s reply to the Appellee’s Brief is currently due on February 22, 2013.
3. Good cause exists for this request. Lead counsel for the Appellant, W. Barry Blum, Esq., is trial counsel in the matter of *Laquer Corporate Realty Group, Inc. Jacob “Hank Sopher, et al*, Case No. 09-85048 CA 02 (Fla. 11th Jud. Cir.), before the Hon. Spencer Eig, and that matter is the number 1 or 2 case on the court’s civil jury trial calendar beginning February 25, 2013. Thus, Mr. Blum is involved in in pre-trial preparation for that matter. In addition, Ms. Contreras-Martinez has

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several pre-existing deadlines, including mediation in two consolidated appeals before this Court on February 21, 2013.

4. Accordingly, Appellant respectfully requests that the time for filing and serving of its Reply Brief be extended to, and including, March 15, 2013, an extension of 21 days.

5. Pursuant to 11th Cir. R. 26-1, Appellant states that its counsel has conferred with counsel for the Appellee, Bank of America, who has no objection to the relief requested.

6. Further, the extension is requested so that justice may be done in this cause, and not for delay.

WHEREFORE, the Receiver/Appellant, requests that the time for filing and serving its Reply Brief in the above cause be extended to March 15, 2013.

Dated this 15th day of February, 2013.

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

Respectfully submitted,

By: /s/ W. Barry Blum
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-and-

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Facsimile: (305) 448-5800
*Attorneys for Appellant, Jonathan E.
Perlman, Esq., court-appointed Receiver*

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CERTIFICATE OF COMPLIANCE WITH FED. R. APP. P. 32(a)

1. This Motion for Extension of Time to File Reply Brief of Appellant Jonathan E. Perlman, Esq., Receiver, complies with the page-volume limitation of Fed. R. App. P. 27(d)(2) because this motion does not exceed 20 pages.

2. This Motion for Extension of Time to File Reply Brief of Appellant Jonathan E. Perlman, Esq., Receiver, complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this motion has been prepared in a proportionally spaced typeface using Microsoft Word 2010 in 14-point Century font.

s/W. Barry Blum
Attorneys for Appellant, Jonathan E. Perlman, Esq., court-appointed Receiver

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on February 15, 2013, pursuant to Fed. R. App. P. 25(d), the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the forgoing document is being served this day on all counsel of record identified on the attached Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF, by E-mail and/or U.S. Mail to those counsel or parties who are not authorized to receive electronically Notices of Electronic Filings.

By: /s/ W. Barry Blum
Attorney

Jonathan E. Perlman, Esq., Appellant v. Bank of America, N.A., Appellee – 11th Circuit Docket No. 12-13436-EE, 12-14073-EE

SERVICE LIST

<p>David C. Cimo, Esq. dcimo@gjb-law.com David P. Lemoie, Esq. dlemoie@gjb-law.com Carmen Contreras-Martinez, Esq. ccontreras@gjb-law.com GENOVESE JOBLOVE & BATTISTA, P.A. 100 Southeast 2nd Street, 44th Floor Miami, Florida 33131</p> <p><i>-and-</i></p> <p>Michael R. Josephs, Esq. mrj@florida-attorneys.com THE JOSEPHS LAW FIRM 255 Alhambra Circle, Suite 700 Coral Gables, Florida 33134 <i>Attorneys for Appellant, Jonathan E. Perlman, Esq., court-appointed Receiver</i> Served via E-Mail</p>	<p>Juan A. Gonzalez, Esq. jag@lgplaw.com Dora F. Kaufman, Esq. dfk@lgplaw.com LIEBLER, GONZALEZ & PORTUONDO, P.A. Courthouse Tower - 25th Floor 44 West Flagler Street Miami, FL 33130 Telephone: (305) 379-0400 Facsimile: (305) 379-9626 Served via E-Mail</p> <p>Mary J. Hackett, Esq. (<i>pro hac vice</i>) mhackett@reedsmith.com Joseph E. Culleiton, Esq. (<i>pro hac vice</i>) jculleiton@reedsmith.com Dustin Pickens, Esq. (<i>pro hac vice</i>) dpickens@reedsmith.com REED SMITH LLP Reed Smith Centre 225 Fifth Avenue Pittsburgh, PA 15222 Telephone: (412) 288-3131 Facsimile: (412) 288-3063 <i>Attorneys for Appellee Bank of America, N.A.</i> Served via CM/ECF</p>
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