

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

CASE NO. 09-81225-CIV-HURLEY/HOPKINS
(Ancillary Proceeding to U.S.D.C. Case No. 08-81565-CIV-HURLEY/HOPKINS)

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

Plaintiff,

v.

FIVE CORNERS INVESTORS I, LLC,
FIVE CORNERS INVESTORS II, LLC,
CFD-REGENCY I, LLC, CFD-REGENCY II, LLC,
and BW ASPIRE, LLC,

Defendants.

**PLAINTIFF RECEIVER'S AGREED MOTION FOR EXTENSION OF TIME TO
RESPOND TO MOTIONS TO DISMISS (D.E. # 4 and 5)**

The Plaintiff, JONATHAN E. PERLMAN, Esq., the court-appointed Receiver (the "Receiver") of Creative Capital Consortium, LLC, A Creative Capital Concept\$, LLC, United Investment Club, LLC and Reverse Auto Loan, LLC, a Florida limited liability company, files this *Agreed* Motion for Extension of Time to Respond to Motions to Dismiss (D.E. #4 and 5) (the "Motion"), and says:

1. The Complaint in the above styled case was filed on August 21, 2009.
2. On September 24, 2009, Defendants Five Corners Investors I, LLC and Five Corners Investors II, LLC filed their Motion to Dismiss the Complaint (D.E. #4).
3. On October 2, 2009, Defendant BW Aspire, LLC filed its Motion to Dismiss the Complaint (D.E. #5).

4. The Receiver has been in contact with counsel for the above Defendants who filed motions to dismiss (these Defendants are all represented by the same counsel), who have agreed to provide pertinent information to the Receiver related to the case in an attempt to determine whether this matter may be resolved without further litigation.

5. The Defendant's have agreed to a twenty (20) day extension of time for the Receiver to file its response to the pending Motions to Dismiss.

6. Accordingly, the Receiver requests a twenty (20) day extension of time to file its responses to the pending Motions to Dismiss.

7. This request is made in good faith, and not for the purposes of delay. The extension requested will not prejudice any party, or this Court.

8. Pursuant to Local Rule 7.1(A)(2) a proposed order is attached hereto.

9. Pursuant to Local Rule 7.1(A)(3), undersigned counsel has conferred with counsel for the Defendants who agrees to the relief requested herein.

WHEREFORE, the Receiver respectfully requests the entry of an order granting the relief requested herein and for any other relief the Court deems appropriate.

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Dated: October 8, 2009
Miami, Florida

Respectfully submitted,

By: /s/ Harris J. Koroglu

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2009, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the below Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Harris J. Koroglu

Harris J. Koroglu, Esq.
Florida Bar No. 32597

SERVICE LIST

JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital Consortium, LLC, et al. v. Five Corners Investors I, LLC, et al.

CASE NO. 09-81225-CIV-HURLEY/HOPKINS

United States District Court, Southern District of Florida

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and BW ASPIRE, LLC,

Defendants.

**ORDER GRANTING RECEIVER'S AGREED MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTIONS TO DISMISS (D.E. # 4 and 5)**

THIS CAUSE came before the Court upon the Receiver's *Agreed* Motion for Extension of Time to Respond to Motions to Dismiss (D.E. # 4 and 5) (the "Motion"). The Court, after reviewing the pleadings and the Motion, and being fully advised in the premises, it is thereupon

ORDERED AND ADJUDGED as follows:

1. The Receiver's Motion is **GRANTED**.
2. The Receiver shall have until October ____, 2009 to respond to both the (i) Five Corners Investors I, LLC and Five Corners Investors II, LLC Motion to Dismiss (D.E. #4) and, (ii) the BW Aspire, LLC Motion to Dismiss (D.E. #5).

DONE AND ORDERED in Chambers at West Palm Beach, Florida this ____ day of
October, 2009.

DANIEL T.K. HURLEY
United States District Judge

cc: All counsel of Record