

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

v.

EQUITYBUILD, INC., EQUITYBUILD  
FINANCE, LLC, JEROME H. COHEN, and  
SHAUN D. COHEN,

Defendants.

Civil Action No.: 18-CV-5587

Hon. John Z. Lee

Magistrate Judge Young B. Kim

**VENTUS HOLDINGS, LLC'S AND VENTUS MERRILL'S, LLC COMBINED MOTION  
FOR LEAVE TO FILE A RESPONSE TO RECEIVER'S OPPOSITION TO VENTUS'S  
MOTION TO STAY**

Ventus Holdings, LLC and Ventus Merrill, LLC (combined as "Ventus") through their attorney, Michael B. Elman & Associates, Ltd., for their Combined Motion for Leave to File a Response to Receiver's Opposition to Ventus's Motion to Stay, states as follows:

1. On October 26, 2020 the Court entered an Order confirming the sale of 6949-59 Merrill, 7600-10 Kingston and 7656-58 Kingston.
2. On October 30, 2020 the Court entered an Order Granting Receiver's Eighth Motion to Confirm the Sale of Certain Real Estate and for Avoidance of Certain Mortgages, Liens, Claims and Encumbrances.
3. On November 3, 2020 Ventus filed a Notice of Appeal as to these two orders.
4. On November 2, 2020 Ventus filed the motion to stay.
5. On November 11, 2020 the Receiver filed his opposition to the motion to stay.

6. The Receiver's opposition contains case citations and other affirmative matters to which Ventus wishes to respond.

7. By this motion, Ventus requests leave to file a response to the Receiver's opposition to Ventus's motion to stay, by November 18, 2020 or alternatively, on the next business day after the Court grants this motion.

WHEREFORE, Ventus Holdings, LLC and Ventus Merrill, LLC respectfully request that the Court enter an order granting this Combined Motion for Leave to File a Response to Receiver's Opposition to Ventus's Motion to Stay, by November 18, 2020 or alternatively, on the next business day after the Court grants this motion

Respectfully Submitted,

s/Michael B. Elman  
Attorney for  
Ventus Holdings, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify on November 13, 2020, the undersigned electronically filed Ventus Holdings, LLC's and Ventus Merrill's Combined Motion for Leave to File a Response to Receiver's Opposition to Ventus's Motion to Stay, via the CM/ECF system and copies thereof were served to counsel of record via the CM/ECF system.

/s/ Michael B. Elman  
Attorney for  
Ventus Holdings, LLC

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