

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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<b>UNITED STATES SECURITIES</b>	)	
<b>AND EXCHANGE COMMISSION,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 18-cv-5587</b>
	)	
<b>v.</b>	)	<b>Honorable Manish S. Shah</b>
	)	
<b>EQUITYBUILD, INC., EQUITYBUILD</b>	)	<b>Magistrate Judge Young B. Kim</b>
<b>FINANCE, LLC, JEROME H. COHEN,</b>	)	
<b>and SHAUN D. COHEN,</b>	)	
	)	
<b>Defendants.</b>	)	

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**UNCONTESTED MOTION FOR EXTENSION OF  
GROUP 6 AND GROUP 7 ADDITIONAL DISCOVERY DEADLINES**

Kevin B. Duff, as receiver (“Receiver”) for the Estate of Defendants EquityBuild, Inc. (“EquityBuild”), EquityBuild Finance, LLC (“EquityBuild Finance”), their affiliates, and the affiliate entities of Defendants Jerome Cohen and Shaun Cohen (collectively, the “Receivership Defendants”), respectfully requests that the Court enter an order extending the current deadlines for additional discovery requests and responses in the Group 6 and Group 7 claims processes. In support of his motion, the Receiver states as follows:

1. On April 1, 2024, the Court entered orders setting schedules for the summary claims process proceedings for Groups 6 and 7. (Dkt. 1637, 1638) These schedules included a deadline of May 15, 2024 for the service of any additional discovery requests, and a deadline of June 12, 2024 for claimants to respond to such additional discovery requests (*Id.*)

2. On or about May 1, 2024, the Receiver received from Group 6 claimants 32 standard discovery responses regarding 48 claims, consisting of 195 files (172 MB), and the Receiver received from Group 7 claimants 47 standard discovery responses regarding 64 claims,

consisting of 774 files (630 MB). Claimants in the Groups 6 and 7 were provided access to the discovery materials for their respective Group on May 10, 2024.

3. Due to the volume of standard discovery responses submitted by both investor lender and institutional lender claimants, the Receiver requires additional time to review those responses and determine whether any additional discovery will be necessary.

4. The Receiver proposes that the deadlines be extended for two weeks, and that such an extension would not impact the July 30, 2024 deadline to complete discovery or the remainder of the schedule entered by the Court.

5. The Receiver understands that at least some of the claimants would also benefit from an additional two weeks to determine whether any additional discovery is needed.

6. The Receiver has shared a draft of this motion with the SEC and with counsel for certain investor and institutional lenders, who have informed the Receiver that they do not object to the requested extension.

WHEREFORE, the Receiver respectfully requests that the Court extend the deadline for the Receiver and claimants in Group 6 and Group 7 to serve additional discovery until May 29, 2024, and the deadline for responses to such additional discovery to June 26, 2024.

Dated: May 14, 2024

Kevin B. Duff, Receiver

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