

GRANTED BY COURT

11/03/2021

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CASE NUMBER: 2019CV33770

**DISTRICT COURT, CITY AND COUNTY OF
DENVER, COLORADO**

1437 Bannock Street
Denver, CO 80202

TUNG CHAN, Securities Commissioner for the State of
Colorado,

Plaintiff,

v.

MARK RAY; REVA STACHNIW; CUSTOM
CONSULTING & PRODUCT SERVICES, LLC; RM FARM
& LIVESTOCK, LLC; MR CATTLE PRODUCTION
SERVICES, LLC; SUNSHINE ENTERPRISES;
UNIVERSAL HERBS, LLC; DBC LIMITED, LLC,

Defendants.

ALEX C MYERS
District Court Judge

▲ COURT USE ONLY ▲

Attorneys for Court-appointed Receiver Gary Schwartz:

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Case Number: 19CV33770

Division: 209

RECEIVER'S MOTION FOR EXTENSION OF TIME TO FILE REPORT

Gary Schwartz, the duly-appointed receiver "Receiver" for all of the assets of Mark Ray ("Ray"), Custom Consulting & Product Services, LLC ("Custom Consulting"), MR Cattle Production Services, LLC ("MR Cattle"), Universal Herbs, LLC ("UH"), DBC Limited, LLC ("DBC"), RM Farm & Livestock, LLC ("RM Farm"), Sunshine Enterprises ("Sunshine") and the real property, equipment, supplies or inventory located at 12700 E. Lone Chimney Road, Glencoe, OK 74032 that are in the name of or under the control of Reva Stachniw ("Glencoe Ranch")

(collectively the “Estate”), hereby moves the Court for an extension of time to file his quarterly report as follows:

1. The Receiver was appointed as Receiver for the Estate by this Court pursuant to Orders dated September 30, 2019 and November 4, 2019 (the “Orders”). Pursuant to the Orders and past reports, he is required to file reports on the condition of the Estate every six months. the Receiver’s next report is due November 1, 2021.

2. The Receiver requests a one-week extension of time to file his report up to and including November 8, 2021.

3. The Receiver requests this extension due to several pending settlements as well as current press of business. The Receiver hopes to finalize additional settlements with investors in the Ponzi scheme prior to filing his next report.

4. The requested extension will permit the Receiver to file a more detailed report with important information regarding the Estate, benefiting the Court, the Plaintiff, and all other parties.

5. No party will be prejudiced by this extension.

6. **CERTIFICATE OF CONFERRAL:** Paragraph 20 of the Order Appointing Receiver does not require that the Receiver confer with other parties prior to filing any “request for relief or approval of any action required by this Order.”

7. This motion is the first time the Receiver has requested an extension of time to file this report.

WHEREFORE, the Receiver respectfully requests a one-week extension of time to file his report, up to and including November 8, 2021, and for all other relief the Court deems proper.

DATED this 1st day of November, 2021

FOSTER GRAHAM MILSTEIN & CALISHER, LLP

By: /s/ Katherine Roush
John A. Chanin, #20749
Katherine A. Roush, #39267
Attorneys for Court-appointed Receiver Gary Schwartz

CERTIFICATE OF SERVICE

I hereby certify that on the 1st Day of November, 2021, a true and correct copy of the foregoing **RECEIVER'S MOTION FOR EXTENSION OF TIME TO FILE REPORT** was electronically filed and served on all parties of record via the Colorado Court E-Filing System.

/s/ Lucas Wiggins
Lucas Wiggins