<b>DISTRICT COURT, CITY AND COUNTY OF</b> <b>DENVER, COLORADO</b> 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.	$\blacktriangle COURT USE ONLY \blacktriangle$
Attorneys for Court-appointed Receiver Gary Schwartz:	
John A. Chanin, #20749	Case Number: 19CV33770
Katherine A. Roush, #39267	
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## NOTICE OF EXTENSION OF CLAIMANTS JPMORGAN CHASE BANK, N.A.'S AND THE INTERNAL REVENUE SERVICES'S OBJECTION DEADLINE TO THE RECEIVER'S PROPOSED PLAN OF DISTRIBUTION

Gary Schwartz ("Receiver"), Court-appointed Receiver for the Receivership Assets of Defendants Mark Ray ("Ray"), Reva Stachniw ("Stachniw"), Custom Consulting & Product Services, LLC ("CCPS"), RM Farm & Livestock, LLC ("RM"), MR Cattle Production Services, LLC ("MR Cattle"), Sunshine Enterprises ("Sunshine"), Universal Herbs, LLC ("Universal"), DBC Limited, LLC, provides this notice of extension which extends the deadline for Claimants the Internal Revenue Service ("IRS") and JPMorgan Chase Bank, N.A. ("Chase"), to file objections to the Receiver's Proposed Plan of Distribution ("Plan") as follows.

1. In the Receiver's motion to approve the proposed Plan and accompanying notice of the plan, filed February 13, 2023, the Receiver set March 15, 2023 as the deadline for Claimants to object to the Receiver's proposed Plan.

2. On March 14, 2023, the Receiver provided notice that he was extending the deadline for Chase and the IRS to object to the proposed Plan, to April 12, 2023.

3. Chase, the IRS and the Receiver have conferred and agree that Chase and the IRS may have an additional four weeks, up to and including May 10th, 2023, in which to file an objection to the proposed Plan.

4. The extension will not prejudice any party or Claimant, and will give all parties the necessary time to evaluate the Plan and object if necessary.

DATED this 12th Day of April 2023.

FOSTER GRAHAM MILSTEIN & CALISHER, LLP

By: /

/s/ Katherine A. Roush John A. Chanin, #20749 Katherine A. Roush, #39267

Attorneys for Court-appointed Receiver Gary Schwartz

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 12, 2023, a true and correct copy of the foregoing was electronically filed and served on all parties of record via the Colorado Court E-Filing System.

<u>/s/ Lucas Wiggins</u> Lucas Wiggins