

criminal prosecution brought by the Government, all in short periods of time after the Orders' entry. In the forthcoming days, the Defendant intends to appeal the Orders to the United States Court of Appeals for the Fifth Circuit. The Defendant also will ask for a stay pending appeal of certain aspects of the Orders. *See* Fed. R. App. P. 8. The Defendant requests amendment of the below listed deadlines to avoid the need for expedited and emergency consideration of the stay requests and to allow for an orderly process for the parties and any courts to which the stay requests are made.

The Defendant therefore respectfully requests that the Orders be amended to substitute forty-five (45) for the time period specified in the following terms:

- (1) the Preliminary Injunction Order's requirement for the Defendant to provide a sworn and detailed accounting statement, for which the time period is currently set at 10 days from the order's entry (Dkt. 418 at 11);
- (2) the Receivership Order's requirement that Defendant personally serve various entities with the order and provide a sworn declaration with certain information, for which the time period is currently set as 10 business days from the order's entry (Dkt. 417 at ¶ 24); and
- (3) the Receivership Order's requirement several persons and entities, including former officers of the corporations seized, provide a sworn statement with certain information (only to the extent that provision is applied to the Defendant), for which the time period is currently set at 5 business days from notice of the order (Dkt. 417 at ¶ 18(B)).

Dated: December 5, 2023

Respectfully submitted,

By: /s/ Michael J. Edney
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CERTIFICATE OF CONFERENCE

I hereby certify that on December 5, 2023, the undersigned counsel consulted with counsel for the Plaintiff, who represented that the Plaintiff does not oppose the relief sought herein.

/s/ Michael J. Edney

CERTIFICATE OF SERVICE

On December 5, 2023, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Michael J. Edney