

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 16-cv-21301-GAYLES**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS,  
WILLIAM STENGER,  
JAY PEAK, INC.,  
Q RESORTS, INC.,  
JAY PEAK HOTEL SUITES L.P.,  
JAY PEAK HOTEL SUITES PHASE II. L.P.,  
JAY PEAK MANAGEMENT, INC.,  
JAY PEAK PENTHOUSE SUITES, L.P.,  
JAY PEAK GP SERVICES, INC.,  
JAY PEAK GOLF AND MOUNTAIN SUITES L.P.,  
JAY PEAK GP SERVICES GOLF, INC.,  
JAY PEAK LODGE AND TOWNHOUSES L.P.,  
JAY PEAK GP SERVICES LODGE, INC.,  
JAY PEAK HOTEL SUITES STATESIDE L.P.,  
JAY PEAK GP SERVICES STATESIDE, INC.,  
JAY PEAK BIOMEDICAL RESEARCH PARK L.P.,  
AnC BIO VERMONT GP SERVICES, LLC,

Defendants, and

JAY CONSTRUCTION MANAGEMENT, INC.,  
GSI OF DADE COUNTY, INC.,  
NORTH EAST CONTRACT SERVICES, INC.,  
Q BURKE MOUNTAIN RESORT, LLC,

Relief Defendants.

Q BURKE MOUNTAIN RESORT, HOTEL  
AND CONFERENCE CENTER, L.P.  
Q BURKE MOUNTAIN RESORT GP SERVICES, LLC,

Additional Receivership Defendants

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**INVESTORS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
OBJECTION TO THE ARIEL QUIROS SETTLEMENT AGREEMENT**

Investors, Wei Wang, Xinjie Hu, Xiaofeng Feng, Guangyi Xiong, Fan Cui, Yinyin Qi, Weiting Lv, Xiaofu Zhang, Yi Wang, Wenxing Yan, Meiye Pan, Manwei You, Hongjun Lai and Qi Zuo (“Investors”), by and through their undersigned counsel, and pursuant to Rule 6(b), Fed. R. Civ. P. and Rule 7.1, Rules of the Southern District, hereby file this Unopposed Motion for Extension of Time to File an Objection to the Ariel Quiros Settlement (the “Plaintiff”), and in support thereof state as follows:

1. On October 19, 2018, Michael I. Goldberg, the court appointed receiver (the “Receiver”) filed a Motion for (I) Approval of Settlement between Receiver and Ariel Quiros; (II) Entry of a Bar Order; and (III) Approval of Form, Content and Manner of Notice of Settlement and Bar Order; and Incorporated Memorandum of Law (the “Quiros Settlement Motion”) (ECF No. 501).

2. The Court entered its order preliminarily approving the Quiros Settlement Motion (the “Preliminary Order”) on October 19, 2018 (ECF No. 502), which set a December 6, 2018 deadline to object to the approval of the Quiros Settlement Motion (the “Objection Deadline”) and set a Final Approval Hearing on December 19, 2018 at 1:30 p.m.

3. Undersigned counsel has been recently retained to represent the Investors and requires additional time to review the settlement reached between the parties.

4. By this Motion, the Investors seek an extension of time, up to and including December 13, 2018, to file an objection to the Quiros Settlement Motion.

5. This Motion is not filed for the purposes of delay, and no party will be prejudiced by the granting of the Investor’s request for this extension of time.

6. In accordance with Rule 7.1 (a)(2), Rules of the Southern District, a proposed order accompanies this Motion.

WHEREFORE, the Investors respectfully request that this Court grant an extension of time, up to and including December 13, 2018, to file their objection to the Ariel Quiros settlement, together with such other and further relief as the Court deems just and proper.

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)**

Jeffrey P. Bast, Esq. and Dana R. Quick, Esq. counsel for the Investors, certify that they have conferred with the Receiver, Michael I. Goldberg, and counsel for Ariel Quiros, Melissa Visconti, on December 4, 2018, who have no objection to the relief requested herein to the extent it is limited only to the 14 Investors identified in this Motion and is not intended to enlarge the deadline for any other individual, entity or party.

Dated: December 5, 2018

Respectfully submitted,

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By: /s/ Jeffrey P. Bast  
Jeffrey Bast, Esq. (FBN 996343)  
Dana R. Quick, Esq. (FBN 74402)

**CERTIFICATE OF SERVICE**

I hereby certify that on this December 5, 2018, a true and correct copy of the foregoing was served electronically via the Court's CM/ECF system where available, on the parties registered to receive electronic notification.

By: /s/ Jeffrey P. Bast  
Jeffrey P. Bast