

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 16-cv-21301-GAYLES

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS, *et al*,

Defendants.

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**FEDERAL CONDOMINIUM ASSOCIATION'S  
MOTION FOR EXTENSION OF TIME TO FILE OBJECTION TO THE  
ARIEL QUIROS SETTLEMENT AGREEMENT**

Federal Condominium Association, Inc. (“the “Association”) by and through its undersigned counsel and with the assistance of counsel for Michael I. Goldberg, the court appointed receiver (the “Receiver”), and pursuant to Rule 6(b), Fed. R. Civ. P. and Rule 7.1, Rules of the Southern District, hereby files this Motion for Extension of Time to File an Objection to the Ariel Quiros Settlement (the “Motion”), and in support thereof state as follows:

1. On October 19, 2018, 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 on October 19, 2018 (ECF No. 502), which set a December 6, 2018 deadline to object to the approval of the Quiros Settlement Motion and set a Final Approval Hearing on December 19, 2018 at 1:30 p.m.

3. Undersigned counsel for the Association has been working with counsel for the

Receiver and counsel for Mr. Quiros toward a resolution of a dispute regarding fees owed to the Association in connection with an office condominium located at 111 NE 1st Street, Miami, Florida. The parties believe they are close to reaching a settlement of the dispute but require a few additional days to finalize an agreement.

4. Therefore, in an abundance of caution, the Association requests that the deadline for it to object to the Quiros Settlement Motion be extended for a brief time pending finalization of a settlement with the Receiver and Mr. Quiros.

5. By this Motion, the Association seeks an extension of time, up to and including December 10, 2018, to file an objection to the Quiros Settlement Motion.

6. 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.

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

WHEREFORE, Federal Condominium Association, Inc. respectfully requests that this Court grant an extension of time, up to and including December 10, 2018, to file its objection to the Ariel Quiros Settlement, together with such other relief as the Court deems just and proper.

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

Undersigned counsel for Federal Condominium Association, Inc. certifies that he has conferred with the Receiver, Michael I. Goldberg, and counsel for Ariel Quiros, Melissa Visconti, who have no objection to the relief requested herein to the extent it is limited only to the Federal Condominium Association, Inc. and is not intended to enlarge the deadline for any other

individual, entity or party.

Dated: December 6, 2018

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this December 6, 2018 via the Court's notice of electronic filing on all CM/ECF registered users entitled to notice in this case as indicated on the attached Service List.

By: /s/ Joan M. Levit  
Joan M. Levit

**SERVICE LIST**

**1:16-cv-21301-DPG Notice will be electronically mailed via CM/ECF to the following:**

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**EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 16-cv-21301-GAYLES

SECURITIES AND EXCHANGE COMMISSION,

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**ORDER GRANTING FEDERAL CONDOMINIUM ASSOCIATION'S  
MOTION FOR EXTENSION OF TIME TO FILE OBJECTION TO THE  
ARIEL QUIROS SETTLEMENT AGREEMENT**

**THIS MATTER** comes before the Court without hearing upon the Motion for Extension of Time to File an Objection to the Ariel Quiros Settlement Agreement (the "Motion") (ECF No. 508) filed by Federal Condominium Association, Inc. ("the "Association") with the assistance of counsel for Michael I. Goldberg, the court appointed receiver (the "Receiver"). The Court, having reviewed the Motion, being advised that the Receiver and counsel for Ariel Quiros have no objection to the relief requested in the Motion, and finding that the Association has made a sufficient and proper showing in support of the relief requested,

**IT IS ORDERED, ADJUDGED AND DECREED**, as follows:

1. The Motion is **GRANTED**.
2. The Association shall have up to and including December 10, 2018, to file an objection to the Quiros Settlement Motion.<sup>1</sup> The relief granted herein is limited only to the Federal Condominium Association, Inc. and is not intended to enlarge the deadline for any other as to any

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<sup>1</sup> See ECF Nos. 501 and 502.

other individual, entity, or parties.

**DONE AND ORDERED** in Chambers at Miami, Florida this \_\_\_\_ day of December 2018.

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DARRIN P. GAYLES  
UNITED STATES DISTRICT COURT JUDGE