

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 16-cv-21301-GAYLES

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

ARIEL QUIROS, *et. al.*

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THE ZHANG PLAINTIFFS' MOTION TO LIFT STAY  
IN THE ZHANG INVESTOR ACTION

The Zhang Plaintiffs, by their undersigned counsel hereby move for entry of an order lifting the stay of the action styled *Zhang v. Raymond James, et. al.*, Case No. 16-cv-24655-KMW (the "Zhang Investor Action"), pending in this court, and show the following:

1. *Background*

On April 20, 2017, this court entered an order granting preliminary approval of a settlement of the settlement between Raymond James & Associates, Inc., the receiver, and interim class counsel. D.E. 318. In that order, this court ordered a stay of all related cases pending approval of the class settlement. *Id.* at 3. The Zhang Investor Action is a related case.

The Zhang Investor Action asserted claims against Raymond James, Joel Burstein, and Ariel Quiros. On April 25, 2017, District Judge Williams entered an order in the Zhang Investor Action staying all claims, including those against Quiros, pending final approval of the class settlement and "an appropriate order from the court in the SEC Action lifting the stay in this case." Zhang Investor Action, No. 16-cv-24655-KMW, D.E. 73 (S.D.Fla. Apr. 25, 2017) at 2.

On June 30, 2017, this court entered a Final Order (I) Approving Settlement Between Receiver, Interim Class Counsel, and Raymond James & Associates, Inc., and (II) Barring,

Restraining, and Enjoining Claims against Raymond James & Associates, Inc. D.E. 353.

2. *Relief Requested by Zhang Plaintiffs*

The Zhang Plaintiffs request that this court enter an order lifting the stay of the Zhang Investor Action so that the case may proceed against Quiros.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 10, 2017, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record listed on the attached Service List in the manner specified, either via transmitting of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Curtis Carlson

**SERVICE LIST**

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