

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA

CIVIL ACTION NO. 6:21-cv-694-CEM-DCI

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

HARBOR CITY CAPITAL CORP.,  
HARBOR CITY VENTURES LLC,  
HCCF-1 LLC,  
HCCF-2 LLC,  
HCCF-3 LLC,  
HCCF-4 LLC,  
HCCF-5 LLC,  
HARBOR CITY DIGITAL VENTURES INC.,  
HCC MEDIA FUNDING LLC,  
JONATHAN P. MARONEY,

Defendants,

and

CELTIC ENTERPRISES LLC and  
TONYA L. MARONEY,

Relief Defendants.

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PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S  
UNOPPOSED MOTION FOR LEAVE TO FILE PROPOSED ORDER  
APPOINTING RECEIVER

Pursuant to Middle District Local Rule 3.01(f), Plaintiff Securities and Exchange Commission moves for leave of Court to file a proposed Order Appointing Receiver that sets forth the Receiver's responsibilities and powers.

On August 11, 2021, this Court granted in part Plaintiff's Unopposed Motion for Appointment of Receiver (Doc. 68) appointing Katherine Donlon as Receiver. In its Order, the Court noted that Ms. Donlon is not authorized to act as receiver until the Court enters an Order concerning the scope of her powers. The Court, also referred Plaintiff's Motion for Entry of Proposed Order Appointing Receiver and a Proposed Order (Doc. 67) to the Magistrate Judge for Consideration.

Plaintiff's Motion for Entry of Proposed Order Appointing Receiver (Doc. 67) was denied by Judge Irick for failure to comply with the Local Rules. Thus, this Motion for Leave is filed in an effort to correct the prior deficiencies noted by Judge Irick and to provide the Court with a Proposed Order that delineates the scope of the Receiver's powers for its review and consideration.

**Local Rule 3.01(g) Certification**

The Undersigned has conferred with counsel for Jonathan P. Maroney who has stated that he has no opposition to this Motion for Leave to File a Proposed Order Appointing Receiver.

**WHEREFORE**, the Commission respectfully requests the Court give leave under Local Rule 3.01(f) for the Plaintiff to file a proposed order that sets for the scope of the Receiver's powers for the Court review.

Respectfully submitted,

August 13, 2021

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on August 13, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the below Service List in the manner specified, either via transmission 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 received electronically Notices of Electronic Filing.

**SERVICE LIST**

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Alise Johnson, Esq.