

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No: 6:21-cv-694-CEM-DCI

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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**RECEIVER'S UNOPPOSED THIRD MOTION TO  
EXTEND TIME TO FILE LIQUIDATION PLAN**

Receiver, Katherine Donlon, by and through undersigned counsel, hereby files this Amended Unopposed Third Motion to Extend Time to File a Liquidation Plan, as required by the Court's Order [Dkt. 75], incorporating by specific reference and adopting the Order Granting Plaintiff's Unopposed Motion for Appointment of Receiver [Dkt. 72-1], paragraph 49.

The Order [Dkt. 72-1] requires the Receiver to file, within ninety (90) days of the entry of the Order, a Liquidation Plan in the matter specifying a fair, reasonable, and efficient recovery and liquidation of all remaining, recovered, and recoverable Receivership Property. See Dkt. 72-1, ¶¶48-49. That date has been extended several times. (Dkts. 84, 91, and 105) The current deadline to file the Liquidation Plan is November 7, 2022. The Receiver respectfully requests a further extension until January 10, 2023 to file her Liquidation Plan.

The largest asset of the Receivership is the house where the Maroneys lived. The Court recently approved the sale of the house. However, there are several issues related to the payoff recently received from the main lienholder. The Receiver is attempting to negotiate with the lenders on these issues but may find it necessary to bring those matters before the Court in order to effectuate the closing on the property.

The Receiver has possession of Mr. Maroney's Mercedes and four jet skis and is working with Mr. Maroney to transfer the titles for those vehicles so that those assets can be sold.

Given these lingering issues, the Receiver is not in a position yet to recommend a Liquidation Plan. Therefore, the Receiver requests an additional time to January 10, 2023, to continue her work. The Receiver is diligently working to obtain the information to file the Liquidation Plan for approval by this Court.

The district court has discretion in ruling on a motion for enlargement of time under Rule 6(b). *Fisher v. Office of State Attorney 13th Judicial Circuit Fla.*,

162 F. App'x 937, 939 (11th Cir. 2006). This motion is not made for purposes of delay, and the relief requested will not prejudice any party. Moreover, granting Receiver's Motion for an Extension of Time is consistent with efficient judicial administration, as it has no impact on the district court or its resources.

WHEREFORE, and based on the foregoing, the Receiver files this Unopposed Third Motion to Extend Time to File a Liquidation Plan and asks for an extension up to and including January 10, 2023, and for such other and further relief as the Court deems appropriate.

Dated: November 7, 2022

Respectfully submitted,

/s/ Nicole Deese Newlon  
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*Counsel for Receiver,*  
*Katherine Donlon*

**LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), neither the SEC nor Mr. Maroney object to the relief sought.

/s/ Nicole Deese Newlon  
Attorney

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 7, 2022, a true and correct copy of the foregoing was electronically filed with the United States District Court, Middle District of Florida, by using the CM/ECF System, which will serve a copy on all counsel of record.

/s/ Nicole Deese Newlon  
Attorney