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., et al.,

Defendants,

and

CELTIC ENTERPRISES, LLC and TONYA L. MARONEY

Relief Defendants.
_____/

RECEIVER'S UNOPPOSED MOTION TO CORRECT SCRIVENER'S ERROR IN ORDER APPROVING FEES

Katherine C. Donlon, the Court-appointed Receiver over the corporate Defendants and Relief Defendant Celtic Enterprises, LLC (the "**Receiver**" and the "**Receivership**" or "**Receivership Estate**") pursuant to the Court's Order dated November 8, 2021 (Doc. 75) (the "**Order Appointing Receiver**"), moves the Court to issue an Amended Order that corrects the scrivener's error contained in the Magistrate's Report and Recommendation ("R&R") recommending that the Receiver's Sixteenth Quarterly Fee

Application be granted (Doc. 238), as well as the Order wherein the District Court adopted the R&R on August 19, 2026 (Doc. 247).

On May 1, 2026, the Receiver filed her Unopposed Sixteenth Quarterly Fee Application for Order Awarding Fees and Reimbursement of Costs to Receiver and Her Professionals (Doc. 232). In that motion, the Receiver sought fees in the amount of $6,965 for time expended by the Receiver. The Magistrate's R&R recommended approving the motion. In the body of the R&R, the fees approved were $6,965. However, in the "Ordered and Adjudged" section at the end of the R&R, the Court recommended approval of $9,695 in fees to the Receiver. (Doc. 238). This amount was repeated in the Order by the District Court adopting the R&R. (Doc. 247) The Receiver has issued payment only for the fees requested but believes it is important that the public filings are correct on this issue. Therefore, the Receiver respectfully requests that this scrivener's error be corrected.

MEMORANDUM OF LAW

Federal Rule of Civil Procedure 60(a) allows a court to correct a clerical mistake or a mistake arising from oversight as long as the error does not affect the substantive rights of the parties. *See, e.g. Arkin v. Smith Med. Partners, LLC*, 2021 WL 2459458, at *1 (M.D. Fla. May 13, 2021). In this case, the correction of the clerical error contained in the proposed order submitted by counsel will not affect the substantive rights of the parties.

CONCLUSION

Based on the foregoing, the Receiver moves the Court for entry of an Amended Order correcting the scrivener's error in the Court's R&R (Doc. 238) and the Order adopting the R&R (Doc. 247).

LOCAL RULE 3.01(g) CERTIFICATION

The Receiver has conferred with counsel for the SEC and is authorized to represent to the Court that the SEC does not object to the relief requested in this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November __, 2026, I electronically filed a true and correct copy of the foregoing with the Clerk of the Court through the CM/ECF system, which served counsel of record.

/s/ Nicole D. Newlon
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