

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COMMODITY FUTURES TRADING)	
COMMISSION,)	
)	
Plaintiff,)	Civil Action No. 22-cv-02465
)	
v.)	Honorable Mary M. Rowland
)	
SAM IKKURTY A/K/A SREENIVAS I RAO,)	Magistrate Judge Jeffrey
RAVISHANKAR AVADHANAM, AND)	Cummings
JAFIA, LLC,)	
)	
Defendants,)	
)	
IKKURTY CAPITAL, LLC D/BA/ ROSE CITY)	
INCOME FUND, ROSE CITY INCOME FUND)	
II LP, AND SENECA VENTURES, LLC,)	
)	
Relief Defendants.)	

**RECEIVER’S MOTION TO EXTEND THE DEADLINE FOR OBJECTIONS TO THE
RECEIVER’S PROPOSED LIQUIDATION PLAN**

James L. Kopecky, not individually, but solely as the Court-appointed Receiver (the “Receiver”) for the Receivership Estate, as defined by the Order Appointing Temporary Receiver dated May 11, 2022 (Dkt. 18) (“Receivership Order”), and pursuant to the Receivership Order, moves to extend the deadline for objections to the Receiver’s proposed liquidation plan. In support thereof, the Receiver states:

1. On July 31, 2023, the Receiver filed his Motion to Liquidate Cryptocurrency in Receivership Estate (the “Liquidation Plan”). (Dkt. 196)
2. On August 1, 2023, the Court entered an Order (Dkt. 199) requiring that any objections to the Receiver’s Liquidation Plan be filed by August 15, 2023.

3. On August 10, 2023, the Receiver participated in a conference call with several investors (representing a larger group of investors) and their counsel. The investors requested that the deadline for objections be extended to August 25, 2023, and asked the Receiver to make that request with the Court. The basis for the requested extension is that the investors intend to object to the Liquidation Plan and make an alternate proposal of their own.

4. The Receiver has no objection to the requested extension.

WHEREFORE, the Receiver requests that the Court extend the deadline for objections to the Receiver's Liquidation Plan to August 25, 2023.

Respectfully submitted,

/s/ Daryl M. Schumacher
*Counsel to James L. Kopecky, Receiver for
Defendants Jafia, LLC, Sam Ikkurty a/k/a
Sreenivas I Rao, Ikkurty Capital LLC d/b/a/
Rose City Income Fund I, Rose City Income
Fund II, LP and Seneca Ventures, LLC*

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CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2023, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will provide electronic notice and an electronic link to this document to all counsel of record.

DATED: August 11, 2023

/s/ Daryl M. Schumacher