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## UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND SOUTHERN DIVISION '

In re SANCTUARY BELIZE LITIGATION

No: 18-cv-3309-PJM

## [PROPOSED] ORDER GRANTING FOURTH APPLICATION FOR EXTENSION OF TERM OF RECEIVER PURSUANT TO STIPULATED JUDGMENTS

The Court, having read and considered the Fourth Application for Extension of Term of Receiver Pursuant to Stipulated Judgments ("Application") brought by Marc-Philip Ferzan of Ankura Consulting Group, LLC, Receiver ("Receiver"), and good cause appearing therefore, it is

ORDERED that the Application shall be and is hereby granted in its entirety; and

IT IS FURTHER ORDERED that without limiting the generality of the preceding sentence, the Receiver's term as set forth in the (1) Stipulated Order for Permanent Injunction and Monetary Judgment Against Defendants Frank Costanzo and Ecological Fox LLC and Relief Defendant Deborah Connelly (Doc. 668) ("Costanzo Judgment"); (2) Stipulated Order for Permanent Injunction and Monetary Judgment Against Defendants Brandi Greenfield and BG Marketing, LLC (Doc. 788) ("Greenfield Judgment"); (3) Stipulated Order for Permanent Injunction and Monetary Judgment Against Defendants Rod Kazazi and Foundation Partners (Doc. 789) ("Kazazi Judgment"); (4) Stipulated Order for Final Judgment Against Relief Defendants Angela Chittenden and Beach Bunny Holdings LLC (Doc. 819) ("Chittenden Judgment"); and (5) Stipulated Order for Permanent Injunction and Monetary Judgment Against Defendant Michael Santos (Doc. 820) ("Santos Judgment") (collectively, the "Stipulated

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Judgments"), and previously extended by the Order Granting Third Application for Extension of Term of Receiver Pursuant to Stipulated Judgments (Doc. 1380) ("Third Extension Order"), shall be and is hereby extended for an additional year to October 10, 2024 in connection with and pursuant to the Stipulated Judgments. To the extent necessary or appropriate, this Order shall be *nunc pro tunc* to October 10, 2023, the final date of the Receiver's term as set forth in the Third Extension Order.

9/27/23 Dated:

HONORABLE PETER J. NITED STATES DISTRICT JUDGE U