UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND SOUTHERN DIVISION

In re SANCTUARY BELIZE LITIGATION

No: 18-cv-3309-PJM

JOINT RECEIVER & FEDERAL TRADE COMMISSION REQUEST FOR STATUS CONFERENCE AND GUIDANCE FROM THE COURT

The Receiver, Marc-Philip Ferzan of Ankura Consulting Group, LLC ("Receiver"), joined by the Federal Trade Commission ("FTC"), hereby requests that the Court schedule a remote status conference to be held as soon as is practical for the Court after July 8, 2024, the date the consumer lot choice survey period provided for in the Court's June 14, 2023 Order Implementing Next Phase of Consumer Redress Plan (Doc. 1446, the "June 14, 2023 Order") will conclude.

More particularly, the Receiver and the FTC request the status conference to update the Court on the results of the survey process, and to seek the Court's guidance relative to the Kanantik land assets and the transferability of subdivided lots to consumers under the terms of the June 14, 2023 Order, and in consideration of other relevant factors. The Receiver and the FTC reserve the right to request that portions of the status conference be heard *in camera* in consideration of the ongoing Request for Proposals marketing process initiated on May 29, 2024, through which the Receivership Team, together with international real estate broker CBRE, Inc., is seeking to solicit bids for the sale of more than 18,000 acres of Belize receivership estate real estate assets.

Respectfully submitted,

Dated: June 26, 2024 By: /s/ Allison M. Rego

Allison M. Rego (CA Bar No. 272840) Admitted Pro Hac Vice 5/25/23 Barnes & Thornburg LLP

655 West Broadway, Suite 1300

San Diego, CA 92101

Telephone: (619) 321-5003 Facsimile: (310) 284-3894 Email: arego@btlaw.com

By: /s/ James E. Van Horn

James E. Van Horn (Bar No. 29210)

Barnes & Thornburg LLP 555 12th Street, N.W.

Suite 1200

Washington, DC 20004-1275 Telephone: (202) 289-1313 Facsimile: (202) 289-1330 Email: jvanhorn@btlaw.com

Attorneys for Receiver, Marc-Philip Ferzan of Ankura Consulting Group, LLC