

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:14-CV-00815-BCW
)	
BF LABS INC., et al.,)	
)	
Defendants,)	

**TEMPORARY RECEIVER’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE REPLY SUGGESTIONS IN SUPPORT OF SECOND APPLICATION FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES**

COMES NOW Temporary Receiver Eric L. Johnson (“Temporary Receiver”) and moves that the Court enter an order extending the deadline for Temporary Receiver to file his Reply Suggestions in Support of his Second Application for Allowance of Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses for the Period November 1 through November 30, 2014, by ten days, up to and including January 9, 2015. In support of this motion, Temporary Receiver states as follows:

1. On May 5, 2015, Temporary Receiver filed his Supplemental Application for Allowance of Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses for the Period January 1 through January 30, 2015 (“Supplemental Application”).

2. Defendant BF Labs, Inc. (“BFL”) filed its opposition to Temporary Receiver’s Second Application on May 13, 2015 (the “Opposition”). Plaintiff Federal Trade Commission (“FTC”) did not file an opposition to the Supplemental Application. Defendant Ghoseiri not file an objection to the Supplemental Application.

3. Generally, under Local Rule 7(e), a party has 14 days to reply to a motion. In this case, the Reply would be due on May . However, the Standing Order (Doc. 77) shortened such period to three (3) business days from the time suggestions in opposition are filed. Under the Standing Order, Temporary Receiver's reply suggestions would have been on May 18, 2015.¹ The Standing Order, however, allows the Court to extend the time limits for good cause. Doc. 77 at 2.

4. Good cause exists for an extension for filing of the reply suggestions. First, pursuant to the Court's March 25 Order [Doc. 277] as supplemented by the Court's May 6, 2015 Order [Doc. 302], there will be additional briefing on the Supplemental Application so this matter is not yet concluded and extending the deadline will not prejudice or delay resolution of these proceedings. Second, the Temporary Receiver is seeking only a short four day extension. The Court has previously granted short extensions to both the Temporary Receiver and BFL with respect to deadlines concerning the fee applications. Third, the requested extension is less than the general 14 day requirement found in the local rules.

5. Temporary Receiver accordingly requests that the Court issue an Order granting a 4-day extension of time to reply to the Opposition, to and including May 22, 2015, in which to file his Reply Suggestions in Support of the Supplemental Application.

6. This motion is not made for the purpose of delay or harassment, and no party will be prejudiced if the motion is granted.

7. Counsel for BF Labs was contacted and have stated that, while they do not agree with all of the aforementioned averments, they do not object to the relief requested.

¹ As a result of oversight/mistake of the shortened deadline, the Temporary Receiver believed the deadline to reply was May 20, 2015. Given lack of prejudice to any party, the Temporary Receiver requests that the Court grant the extension notwithstanding the untimely filing of this Motion.

8. Pursuant to the Court's Standing Order (Doc. 77), a proposed order in Word format granting the relief requested herein is being submitted to the Court by email to joella_baldwin@mow.uscourts.gov.

WHEREFORE, Temporary Receiver respectfully requests that the Court grant Temporary Receiver a four-day extension of time, to and including May 22, 2015, in which to file his Reply Suggestions in Support of the Supplemental Application.

Respectfully Submitted,

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**ATTORNEYS FOR TEMPORARY
RECEIVER ERIC L. JOHNSON**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of May, 2015, a true and correct copy of the foregoing was filed electronically with the United States District Court for the Western District of Missouri using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Bryant T. Lamer

Attorney for Temporary Receiver Eric L.
Johnson