

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

CASE NO.: 2:09-CV-229-FTM-29SPC

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

FOUNDING PARTNERS CAPITAL MANAGEMENT  
and WILLIAM L. GUNLICKS,

Defendants,

FOUNDING PARTNERS STABLE-VALUE FUND, LP,  
FOUNDING PARTNERS STABLE-VALUE FUND II, LP,  
FOUNDING PARTNERS GLOBAL FUND, LTD., and  
FOUNDING PARTNERS HYBRID-VALUE FUND, LP,

Relief Defendants.

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**THE RECEIVER'S NOTICE CONCERNING PROPOSED DISTRIBUTION [D.E. 531]**

Receiver Daniel S. Newman, not individually, but solely in his capacity as the Court-appointed receiver ("Receiver") for Founding Partners Capital Management Company; Founding Partners Stable-Value Fund, L.P.; Founding Partners Stable-Value Fund II, L.P.; Founding Partners Global Fund, Ltd.; and Founding Partners Hybrid-Value Fund, L.P., hereby gives notice that the deadline for objections to his Motion for Court Approval of Interim Distribution of Funds ("Distribution Motion"), [D.E. 531], has passed and no objections were filed.

On March 31, 2021, the Receiver filed his Distribution Motion. [D.E. 531]. On April 9, 2021, the Court entered an order setting an amended objection schedule on the Motion for Distribution ("Order"). [D.E. 538]. Among other things, the Order set April 23, 2021 as the

deadline for objections to the Distribution Motion. As stated above, no objections to the Distribution Motion were filed or sent to the Receiver.

Dated: May 10, 2021.

Respectfully submitted,

**NELSON MULLINS BROAD AND CASSEL**

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By: /s/ Jonathan Etra

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Jonathan Etra

Jonathan Etra

**SERVICE LIST**

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| <p><b>Robert K. Levenson, Esq.</b><br/>Miami Regional Trial Counsel<br/>Securities and Exchange Commission<br/>801 Brickell Avenue, Suite 1800<br/>Miami, FL 33131<br/>305-982-6341 (direct dial)<br/>305-536-4154 (facsimile)<br/><a href="mailto:levensonr@sec.gov">levensonr@sec.gov</a><br/><i>Counsel for U.S. Securities and<br/>Exchange Commission</i></p> <p><u>Service via CM/ECF</u></p> | <p><b>Gabrielle D'Alemberte, Esq.</b><br/>The D'Alemberte Trial Firm, P.A.<br/>1749 N.E. Miami Ct.<br/>Suite 301<br/>Miami, FL 33132<br/><a href="mailto:gabrielle@dalemberte.com">gabrielle@dalemberte.com</a><br/><i>Counsel for William &amp; Pamela Gunlicks</i></p> <p><u>Service via CM/ECF</u></p> |
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