

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 9:19-80633-ROSENBERG/REINHART

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

**NATURAL DIAMONDS INVESTMENT CO.,
et al.,**

Defendants, and

H.S. MANAGEMENT GROUP LLC, et al.,

Relief Defendants.

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR 1 DAY TO MODIFY SUMMARY JUDGMENT MOTION
AND STATEMENT OF UNDISPUTED FACTS IN LIGHT OF
TENTATIVE SETTLEMENTS WITH ALL BUT ONE PARTY**

On Friday, May 29, 2020, Plaintiff Securities and Exchange Commission asked the Court to extend the deadline for dispositive motions for one business day, until Monday, June 1, 2020, due to ongoing settlement negotiations that, if successful, would obviate the need to burden the Court with the summary judgment motions. The Court granted the Motion.

Settlement discussions were successful. The Commission has been able to resolve the need for summary judgment motions with respect to all but one party – namely, Relief Defendant Gold 7 of Miami, LLC. However, the process only concluded about 90 minutes ago, when undersigned received signed Consents to Final Judgments from Defendants Harold Seigel and Jonathan Seigel, and Relief Defendant H.S. Management shortly before 10:00pm tonight.

Since that time, undersigned counsel has endeavored to edit the summary judgment motion and statement of undisputed facts to remove the facts and arguments against these three parties and to renumber the statement of facts, change the cites to the facts within the motion, and

renumber the exhibits. Despite undersigned's best efforts, it is simply not possible to conclude this process by midnight.

The Commission therefore respectfully requests through Tuesday, June 2, 2020 to file the revised Summary Judgment Motion and the Statement of Facts and exhibits thereto. This Motion is not sought for purposes of delay, and would not affect the trial date. Indeed, this brief enlargement of time will enable undersigned to file a much shorter Motion and Statement of Facts, focused on the continually narrowing portion of remaining issues before the Court.¹

June 1, 2020

Respectfully submitted,

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CERTIFICATE OF CONFERRAL

Counsel for Defendants Harold Seigel and Jonathan Seigel, and Relief Defendant H.S. Management, has no objection to the relief sought herein. Due to the fact that the issue requiring modification of the filings occurred late tonight, undersigned counsel has not been able to speak with Counsel for the remaining parties, but has emailed them.

s/Amie Riggle Berlin
Amie Riggle Berlin

¹ On June 2, the Commission will also file the Notice of Tentative Settlements, requesting a stay to seek authorization from the Commissioners of the Securities and Exchange Commission to enter the settlements with the Defendants.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 1, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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Amie Riggle Berlin

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH
CASE NO.: 9:19-80633-ROSENBERG/REINHART

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO., ET AL.

**ORDER GRANTING PLAINTIFF'S MOTION FOR 1-DAY ENLARGEMENT OF TIME
TO FILE PRETRIAL MOTIONS**

THIS MATTER came before the Court upon the Plaintiff's Motion for 1-Day Enlargement of Time to File Pretrial Motions due to executed settlement papers received from three parties to the litigation in the hours before the June 1 deadline, and the Court, after reviewing the Motion and otherwise being duly advised,

IT IS HEREBY ORDERED that the Motion **IS GRANTED**. The Plaintiff shall have until Tuesday, June 2, 2020 to file dispositive motions.

DONE AND ORDERED in Chambers in West Palm Beach, Florida, this ___ day of June, 2020.

ROBIN L. ROSENBERG
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Palm Beach Division)**

Case No. 9:19-CV-80633-ROSENBERG

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

NATURAL DIAMONDS INVESTMENT CO.,
et al.,

Defendants,

H.S. MANAGEMENT GROUP LLC, et al.,

Relief Defendants.

**ORDER GRANTING RECEIVER'S
UNOPPOSED MOTION TO EMPLOY ACCOUNTANTS**

THIS MATTER is before the Court upon the Receiver's Unopposed Motion to Employ Accountants [DE 202] (the "Motion"). The Court has reviewed the Motion, the record, and being otherwise advised in the premises, it is hereby **ORDERED and ADJUDGED** that:

1. The Motion is **GRANTED**.
2. The Receiver is hereby authorized to employ Kaufman & Company P.A. as his accountants for the benefit of the Receivership Estate.

DONE AND ORDERED in Chambers at West Palm Beach, Florida, this _____ day of _____, 2020.

**ROBIN L. ROSENBERG
UNITED STATES DISTRICT COURT JUDGE**

Copies to: Counsel of Record