

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION, :
 :
 Plaintiff, :
 :
 -v- :
 :
 LEGEND VENTURE PARTNERS LLC, :
 :
 Defendant. :
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No. 1:23-cv-05326-LAK

**NOTICE OF MOTION FOR APPROVAL OF THE
RECEIVER’S PROPOSED PLAN OF DISTRIBUTION**

PLEASE TAKE NOTICE that Melanie L. Cyganowski, as Receiver in this Action (the “**Receiver**”) will move before the Honorable Lewis A. Kaplan, United States District Judge for the United States District Court for the Southern District of New York (the “**Court**”), located at Daniel Patrick Moynihan United States Court House, 500 Pearl Street, New York, NY 10007-1312, at a date and time to be set by the Court, for entry of an order granting her “Motion for Approval of the Receiver’s Proposed Plan of Distribution” (the “**Motion**”).¹

PLEASE TAKE FURTHER NOTICE that you may obtain a copy of the papers in support of the Motion, free of charge (i) through the Receivership website at <https://www.legendreceivership.com/>; (ii) making a request by email to the Receiver at her email address LegendReceiver@Otterbourg.com; or (iii) making a request via telephone by calling the telephone number (720)930-4881 (Domestic) or (855)704-4075 (international).

PLEASE TAKE FURTHER NOTICE that any opposition or other response to the Motion must be made in writing and **if by a non-party such as an investor**, electronically mailed

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

to the Receiver at her e-mail address: LegendReceiver@otterbourg.com, or mailed to Legend Receivership c/o Otterbourg P.C., 230 Park Avenue, New York, NY 10169, Attention: Erik B. Weinick, Esq., in either case, so as to be received no later than the date to be set by the Court (the “**Response Deadline**”) which date will be posted on the Receivership website (<https://www.legendreceivership.com/>) and mailed and/or e-mailed to all investors and claimants to the extent their addresses are known to the Receivership. The Receiver will consolidate and file any non-party opposition or other responses as a single docket entry no later than three (3) business days following the Response Deadline. The Receiver’s reply papers, if any, will be filed by the date to be set by the Court.

PLEASE TAKE FURTHER NOTICE that, in the absence of any timely filed or served written opposition, the Court, without further hearing or notice, may enter the proposed Order Granting the Motion for Approval of the Receiver’s Proposed Plan of Distribution submitted herewith.

Dated: May 28, 2025

By: /s/ Peter Feldman
Peter Feldman
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Melanie L. Cyganowski, as Court-Appointed Receiver