

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Securities and Exchange Commission,

Plaintiff,

vs.

Case No. 23-20719-Civ-SCOLA

BKCoin Management, LLC  
and other Defendants,

Defendants.

**RECEIVER'S UNOPPOSED MOTION TO EXTEND  
CLAIMS BAR DATE BY THIRTY-FIVE DAYS**

Michael I. Goldberg, the Court appointed receiver (the "Receiver") in the above-captioned case, respectfully submits this *Unopposed Motion to Extend Claims Bar Date By Thirty-Five Days* (the "Motion"). In support of this Motion, the Receiver states as follows:

1. On February 23, 2023, the Securities and Exchange Commission (the "SEC") filed its *Complaint for Injunctive and Other Relief* (ECF No. 1) (the "Complaint") together with its *Motion and Memorandum of Law for Appointment of Receiver* (ECF No. 4).<sup>1</sup>

2. On February 24, 2023, the Court entered its *Order of Appointment* (ECF No. 8) (the "Receivership Order") granting the SEC's motion and appointing Mr. Goldberg as Receiver over Defendant BKCoin Management LLC and Relief Defendants.

3. On December 30, 2024, the Receiver filed his *Motion to Establish and Approve*:

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<sup>1</sup> The Complaint seeks relief against BKCoin Management LLC and one of its managing members, Min Woo Kang (a/k/a "Kevin Kang") (the "Defendants") and against BKCoin Management LLC, BKCoin Capital, LP, BK Offshore Fund, Ltd, BKCoin Multi-Strategy Master Fund, Ltd., BKCoin Multi-Strategy Fund, LP., BKCoin Multi-Strategy Fund, Ltd., and Bison Digital LLC (the "Relief Defendants").

(1) *Procedure to Administer and Determine Claims*; (2) *Claims Bar Date and Notice Procedure*; and (3) *Proof of Claim Form* (ECF No. 203)(the “Claims Procedure Motion”). The Claims Procedure Motion sought to establish a claims process for the eventual distribution of recovered funds.

4. On January 7, 2025, the Court entered an *Order on Receiver’s Motion to Establish Claims Procedure* (ECF No. 205)(the “Claims Procedure Order”).<sup>2</sup> The Claims Procedure Order approved the Claims Procedure outlined in the Claims Procedure Motion including the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim Form, the Notice of Claims Bar Date by Publication, and the Proof of Claim Form. The Claims Procedure Order established the deadline for Claimants to submit a completed and signed Proof of Claim Form as 11:59 p.m. EST on Monday, April 7, 2025.

5. The Receiver has complied with the Claims Procedure Order. The Receiver, *inter alia*, completed the process for serving notice to the Claimants, established a website for the purpose of publishing notice of the Claims Process, and provided notice by publication in the Miami Herald.

6. Pursuant to the Notice of Claims Bar Date and Procedures for Submitting a Proof of Claim Form, Claimants were to email a completed and signed Proof of Claim Form to the Receiver at [bkcoin@akerman.com](mailto:bkcoin@akerman.com). It has come to the Receiver’s attention that a computer glitch may have impacted the submission of some claims. Certain emails may have inadvertently been quarantined and, therefore, would not have been delivered to the Receiver and those Claimants would not have received a confirmation. The Receiver is unable to restore the quarantined emails

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<sup>2</sup> Capitalized words take on the meaning ascribed to them in the Claims Procedure Motion and/or Claims Procedure Order unless otherwise defined herein.

and, thus, does not have a record of those Proof of Claim Forms.

7. The Receiver has been able to resolve the computer glitch so that a quarantined email will now be delivered to the Receiver.

8. In order to protect the Claimants' rights, the Receiver requests a thirty-five (35) day extension of the Claims Bar Date in order to (i) provide notice to the Claimants of the extension, and (ii) provide Claimants the opportunity to submit their Proof of Claim Form by the extended deadline.

9. The Receiver will publish notice of the extended deadline on the website, by mail and/or email to all known addresses for Claimants, and by publication in the Miami Herald. The Receiver will deduct the costs associated with the additional publication from any fee application submitted to the Court.

10. Through this Motion, the Receiver respectfully requests an additional thirty-five (35) days for Claimants to file a Proof of Claim Form, through and including **Monday, May 12, 2025**.

11. This extension is sought in good faith and no parties will be prejudiced by the Court granting the relief requested herein.

12. Pursuant to Local Rule 7.1(a)(1)(J), it is not necessary to incorporate a memorandum of law into a motion for extension of time when good cause is set forth in the motion. For the reasons set forth herein, good cause exists to extend the deadline for Claimants to file a Proof of Claim Form by thirty-five (35) days to May 12, 2025.

13. A proposed order extending the deadline is attached hereto as **Exhibit A**.

WHEREFORE, the Receiver respectfully requests this Court enter an Order granting the this *Unopposed Motion to Extend Claims Bar Date By Thirty-Five Days* and any such other relief as this Court deems just and proper.

**LOCAL RULE 7.1 CERTIFICATION OF COUNSEL**

Pursuant to Local Rule 7.1, undersigned counsel hereby certifies that the Receiver has conferred with counsel for the SEC, which consents to the relief requested herein.

Dated: April 9, 2025

Respectfully submitted,

By: /s/ Michael I. Goldberg  
Michael I. Goldberg, Esq.  
Florida Bar No. 886602  
Email: [michael.goldberg@akerman.com](mailto:michael.goldberg@akerman.com)  
*Court Appointed Receiver*

AKERMAN LLP  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 9, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the forgoing document is being served this day by transmission of Notices of Electronic Filing generated by CM/ECF to those parties registered to receive electronic notices of filing in this case.

By: /s/ Michael I. Goldberg  
Michael I. Goldberg, Esq.



**EXHIBIT A**

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

Securities and Exchange Commission,

Plaintiff,

vs.

Case No. 23-20719-Civ-SCOLA

BKCoin Management, LLC  
and other Defendants.

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**ORDER GRANTING RECEIVER'S UNOPPOSED MOTION  
TO EXTEND CLAIMS BAR DATE BY THIRTY-FIVE DAYS**

This matter came before the Court upon the filing of Receiver Michael I. Goldberg's (the "Receiver") *Unopposed Motion to Extend Claims Bar Date By Thirty-Five Days* (the "Motion") [ECF No. \_\_\_\_]. Upon review of the Motion, the Court finds that the Receiver has made a sufficient and proper showing in support of the relief requested. It is therefore:

**ORDERED and DECREED:**

1. The Motion is **GRANTED**.
2. The deadline for Claimants to file a Proof of Claim Form<sup>1</sup> is extended through and including May 12, 2025.
3. This Court shall retain jurisdiction of this matter for all purposes.

DONE AND ORDERED in Chambers at Miami, Florida this \_\_\_\_\_ day of April, 2025.

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ROBERT N. SCOLA, JR.  
UNITED STATES DISTRICT COURT JUDGE

Copies to:  
Counsel of Record

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<sup>1</sup> Capitalized words take on the meaning ascribed to them in the Motion unless otherwise defined herein.