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April 28, 2025

**VIA ELECTRONIC FILING**

The Honorable Paula Xinis  
United States District Court  
6500 Cherrywood Lane  
Suite 225  
Greenbelt, MD 20770

**RE: *In re Sanctuary Belize Litigation*, Case No. 18-cv-3309-PX (D. Md.)  
Letter Order (Doc. 1576) – Request for Remote Appearance and Hearing**

The Honorable Judge Xinis,

On April 18, 2025, the Court issued a Letter Order (Doc. 1576) setting a hearing on Monday, May 5, 2025, on the Receiver's *Motion for Determination that No Amount is Owed by the Receivership Estate Under the Kessler Lien and Related Relief* (Doc. 1565, "Kessler Motion").<sup>1</sup> The Order also established a deadline of Friday, May 2, 2025, at 5:00 pm, for Ms. Nagy Kessler to notify the Court as to whether she intends to participate at the hearing.

In an effort to conserve and efficiently utilize the limited resources of the receivership estate, the Receiver respectfully requests permission for both his lead counsel, who is based in California, and himself to attend the May 5 hearing remotely. Allowing remote participation would help avoid potentially unnecessary travel expenses, particularly because the Receiver may not know whether Ms. Kessler has responded to the Court's deadline until the day of the hearing.

Additionally, to the extent that the Court will be hearing oral argument on the pending Sale Approval Motion<sup>2</sup> and related motions<sup>3</sup>, the Receiver, with the consent of the FTC, respectfully

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<sup>1</sup> The Receiver served a copy of the Letter Order by overnight mail on April 18, 2025. Doc. 1577.

<sup>2</sup> "Sale Approval Motion" means and refers to the *Receiver's Recommendation and Amended Motion for (I) Approval of Sale of Real Property Commonly Referred to as Sanctuary Belize and Kanantik, as well as Related Personal Property; and (II) Other Related Relief* (Doc. 1556-1556-4) and *Receiver's Asset Sale Status Report, Final Recommendation and Request for Entry of Order (I) Approving of Sale of Real Property Commonly Referred to as Sanctuary Belize and Kanantik, as well as Related Personal Property; and (II) Other Related Relief* (Doc. 1562-1562-3).

<sup>3</sup> *Motion to Intervene* (Doc. 1563-1563-1) and *Motion on Behalf of Bob Yari to Seek Relief Related to the Receiver's Request for Final Approval of the Receivership Sale* (Doc. 1564-1564-1), and *Receiver's*

requests that it occur on May 5, even if there is no necessity for a hearing on the Kessler Motion. Pursuant to the Receiver's status conference request (Doc. 1572), the Receiver is seeking a ruling on the proposed sale as soon as the Court's schedule permits, as the receivership estate continues to incur significant carrying costs associated with the Belize assets, and other material risks confront the estate until a closing and transfer of the assets may occur.

The Receiver remains available for any hearing or conference at the Court's convenience and appreciates the Court's consideration of this request.

Respectfully submitted,

Dated: April 28, 2025

By: /s/ Allison M. Rego  
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*Opposition to Motion to Intervene and Motion on Behalf of Bob Yari to Seek Relief Related to Receiver's Request for Final Approval of the Receivership Sale (Doc. 1567-1567-3) and FTC's Joinder in the Receiver's Opposition to Bob Yari's Motion to Intervene (Doc. 1569-1569-1).*