

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

WASHINGTON, D.C. 20549

June 16, 2025

VIA ECF

Hon. Madeline Cox Arleo Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102

Re: S.E.C. v. Coburn, et al., Civil No. 2:19-cv-05820-MCA-MAH

Dear Judge Arleo:

Plaintiff Securities and Exchange Commission and Defendants Gordon Coburn and Steven Schwartz (collectively, the "Parties") write to provide a joint status update and request an extension of the current stay in this case. *See* ECF No. 78. The Parties have reached an agreement in principle to resolve this matter in its entirety, subject to Commission review and approval. The Commission review and approval process is ongoing. The Parties submit that it is in each of their interests to continue the stay in this matter while undersigned counsel for the Commission seeks approval for the proposed settlement; agree that no party or non-party would be prejudiced by continuing the stay, and that continuing the stay is in the Court's and the public's interest because a resolution would conserve judicial resources; and submit that continuing the stay interferes with no current Court-issued deadlines.

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Accordingly, the Parties respectfully request that this Court grant this joint request and continue the stay in this matter for sixty (60) days.

Respectfully submitted,

/s/John J. Bowers

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Counsel for Defendant Steven Schwartz

IT IS SO ORDERED on this o	day of June 2025.
Hon. Madeline Cox Arleo, USDJ	