

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>	
SECURITIES AND EXCHANGE	:
COMMISSION,	:
	:
	:
Plaintiff,	:
	:
v.	:
	:
GIANLUCA DI NARDO,	:
CORRALERO HOLDINGS, INC.,	:
OSCAR RONZONI,	:
PAOLO BUSARDO,	:
TATUS CORP., and	:
A-ROUND INVESTMENT, SA	:
	:
Defendants.	:
<hr/>	

Case No. 1:08-cv-06609-PAC

Related Case: 08-cv-4520-PAC

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S MOTION TO
ESTABLISH FAIR FUND, APPROVE
DISTRIBUTION PLAN, AND ESTABLISH NOTICE PROCEDURES**

Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) respectfully moves this Court for an Order (i) establishing a Fair Fund under the Fair Fund provisions of Section 308(a) of the Sarbanes-Oxley Act of 2002, as amended [15 U.S.C. § 7246(a)]; (ii) approving the Commission’s plan to distribute the Fair Fund submitted herewith (attached as Exhibit A to the SEC’s Memorandum of Law); and (iii) establishing notice procedures as set forth in the proposed Distribution Plan.

This Motion is supported by the accompanying Memorandum of Law, the proposed Distribution Plan and the Declaration of Stuart Jackson (attached as Exhibit B to the SEC’s Memorandum of Law).

WHEREFORE, the Commission respectfully requests that this Court enter the proposed Order and grant such relief as the Court deems just and proper.

Dated: September 17, 2013

Washington, DC

Respectfully submitted,

s/ Nichola L. Timmons
Nichola L. Timmons
Attorney for Plaintiff
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-5631
Tel: (202) 551-4456
Fax: (703) 813-9728
Email: Timmonsn@sec.gov

CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2013, I electronically filed the foregoing Plaintiff Securities and Exchange Commission's Motion to Establish Fair Fund, Approve Distribution Plan, and Establish Notice Procedures, Memorandum in Support thereof, and proposed Order with the Clerk of the Court using the CM/ECF system.

s/ Nichola L. Timmons
Nichola L. Timmons