

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17342

In the Matter of

RD Legal Capital, LLC, and Roni Dersovitz

Respondents.

PARTIES' JOINT AGREEMENT ON ALTERNATIVE PROCEDURES

The Division of Enforcement (“Division”), by counsel, and Respondents Roni Dersovitz (“Dersovitz”) and RD Legal Capital, LLC (“RDLC,” together with the Division and Dersovitz, the “Parties”), by counsel, hereby submit this agreement regarding alternative procedures for resolving this matter pursuant to the Commission’s Order of August 22, 2018 in *In re Pending Administrative Proceedings*. The Parties hereby expressly agree as follows:

1. The Parties recognize that, according to Lucia v. SEC, 138 S. Ct. 2044 (2018), Respondents are entitled to a “new hearing” before “another ALJ (or the Commission itself).” Id. at 2055.
2. The Parties agree to proceed before Administrative Law Judge Jason S. Patil (“ALJ Patil”), who presided over these proceedings before the Supreme Court decided Lucia.

3. Respondents knowingly and voluntarily waive any claim or entitlement to a new hearing before another ALJ or the Commission itself, and instead knowingly and voluntarily elect to proceed before ALJ Patil.

4. Respondents and the Division agree to have the remainder of these proceedings conducted on the evidentiary record that was compiled before ALJ Patil, including the evidentiary record compiled during the hearing that took place before ALJ Patil from March 20 through April 27, 2017, and all posthearing briefing and submissions (without waiving any of the objections therein contained to the admission of any evidence).

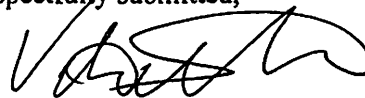
5. Unless so ordered by ALJ Patil, the Parties knowingly and voluntarily agree that the remainder of the proceedings before ALJ Patil will not include taking new evidence, although the parties may, if they choose, file supplemental briefing with the ALJ according to rules and a schedule set by the ALJ.

6. Review of the resulting initial decision by ALJ Patil will proceed according to the Commission's Rules of Practice, including Rule 410.

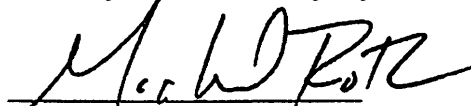
7. Respondents knowingly and voluntarily waive any and all challenges to the appointment of Judge Patil whether before the ALJ, the Commission or a federal court. Respondents expressly preserve all other challenges to the ALJ process, such as due process challenges, and tenure or removal based structural challenges, and any other issues preserved during the proceedings.

Dated: September 7, 2018

Respectfully submitted,



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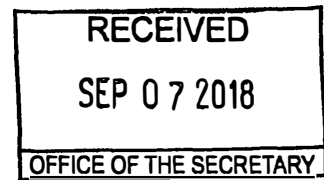


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September 7, 2018

Via Email and By Hand Delivery

Hon. Brenda P. Murray
Chief Administrative Law Judge
U.S. Securities and Exchange Commission
100 F Street, NE
Mail Stop 1090
Washington, DC 20549

Re: In the Matter of RD Legal Capital, LLC, et al., File No. 3-17342

Dear Judge Murray:

Please see the enclosed Parties' Joint Agreement on Alternative Procedures concerning the above-captioned administrative proceeding. The original and three copies are being sent to the Office of the Secretary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Victor Suthammanont".

Victor Suthammanont

Enclosures

Hon. Jason S. Patil

June 2, 2017
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CC (via email):

Terence Healy, Esq.

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David Willingham, Esq.