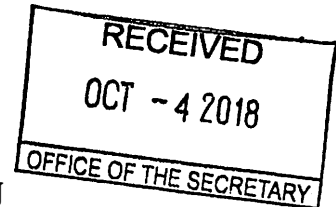


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549



ADMINISTRATIVE PROCEEDING
File Nos. 3-17545, 3-17546, 3-17547, 3-17548, 3-17549

In the Matters of

Fusion Pharm, Inc.;

Scott M. Dittman, CPA;

William J. Sears;

**Microcap Management LLC;
Bayside Reality Holdings LLC; and
Meadpoint Venture Partners LLC;**

Cliffe R. Bodden

Respondents.

**Proposal for Conduct of
Further Proceedings**

On September 13, 2018, Administrative Law Judge James E. Grimes issued an Order Following Reassignment directing the parties to submit proposals for the conduct of further proceedings by October 3, 2018. The Order noted that the orders instituting these proceedings directed that hearings be convened following the entry of a final judgment against the last remaining defendant(s) in *United States v. William Sears and Scott Matthew Dittman*, No. 16-cr-301-WJM (D. Colo.), and directed that the parties include a report on the status of that case.


The Court in *United States v. Sears* is postponing sentencing and entry of final judgment against William Sears and Scott Dittman pending a criminal trial in another

related matter, *United States v. Guy M. Jean-Pierre, a/k/a Marcello Moninguez de Guerra*, 17-cr-00008-WJM(s) (D. Colo.). Based on discussions with the United States Attorney's Office for the District of Colorado, the Division of Enforcement understands that the parties in the *U.S. v. Jean-Pierre* matter are awaiting the setting of a trial date, and do not know when the trial date is likely to be set.

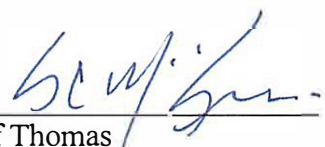
As noted in the orders instituting proceedings, Respondents have submitted Offers of Settlement relating to liability that the Commission has determined to accept, but agreed to postpone further proceedings relating to disgorgement and/or civil penalties, pending final judgments in the *U.S. v. Sears* matter.

The undersigned parties jointly request that Judge Grimes stay this action under 17 C.F.R. § 201.161(a) pending the entry of final judgments in the *U.S. v. Sears* matter. Counsel for the SEC reached out to counsel for all parties, did not hear back from counsel for FusionPharm, and was told that former counsel no longer represented Bayside Realty Holdings LLC. A stay is justified because the anticipated final judgments in *U.S. v. Sears* are likely to obviate the need for a hearing or hearings in these matters. *See* 17 C.F.R. § 201.161(c)(1).

Respectfully submitted,



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37  w/permission

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*Counsel for Respondents William J. Sears,
Microcap Management LLC, and
Meadpoint Venture Partners, LLC*
(Notice of Withdrawal will be effective
10/5/2018)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served on the following on this 3rd day of October, 2018, in the manner indicated below:

Securities and Exchange Commission
Brent Fields, Secretary
100 F Street, N.E.
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Washington, D.C. 20549
(By Facsimile and original and three copies by UPS)

Hon. Judge James E. Grimes
100 F Street, N.E.
Mail Stop 2557
Washington, D.C. 20549
(By Email)

All signators above
(By Email)


Nicole L. Nesvig
Senior Trial Paralegal