

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

SECURITIES AND EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 15-CV-00191-S-LDA
	)	
PATRICK CHURCHVILLE,	)	
CLEARPATH WEALTH MANAGEMENT, LLC,	)	
	)	
Defendants,	)	
	)	
and	)	
	)	
CLEARPATH MULTI-STRATEGY FUND I, L.P.,	)	
CLEARPATH MULTI-STRATEGY FUND II, L.P.,	)	
CLEARPATH MULTI-STRATEGY FUND III, L.P.,	)	
HCR VALUE FUND, L.P.,	)	
	)	
Relief Defendants.	)	
	)	

**RECEIVER’S MOTION TO ESTABLISH A CLAIMS BAR DATE, APPROVE THE MANNER AND FORM OF NOTICE OF CLAIMS BAR DATE AND APPROVE THE PROCESS FOR SUBMITTING CLAIMS**

Now comes Stephen F. Del Sesto, Esq., solely in his capacity as the Court-appointed Receiver for Defendants Patrick Churchville and ClearPath Wealth Management, LLC and Relief Defendants ClearPath Multi-Strategy Fund I, L.P., ClearPath Multi-Strategy Fund II, L.P., and ClearPath Multi-Strategy Fund III, L.P. (collectively “Receivership Entities”) and respectfully moves this Court for an Order, substantially in the form of the Proposed Order filed simultaneously herewith, (1) establishing a claims bar date for the filing of claims against the Receivership Entities and the Receivership Estate; (2) approving the manner and form of notice of the claims bar date; and (3) approving the Creditor Proof of Claim Form, the Investor Proof of Claim Form and procedures for submitting proofs of claim.

For all of the reasons addressed in the accompanying Memorandum of Law, the Receiver respectfully requests that the Court grant this Motion and:

1. Enter the proposed Claims Bar Date Order, substantially in the form attached hereto as **Exhibit A**, which among other things will establish a deadline for the filing of claims with the Receiver and the Receivership Estate as of 5:00 p.m. (Eastern Standard Time) on the date which is one hundred twenty (120) days after the entry of the proposed Claims Bar Date Order;
2. Approve the form and manner of the proposed Notices thereof, which Notices are attached hereto as **Exhibit B** and **Exhibit E**;
3. Approve the proposed Creditor Proof of Claim Form and the proposed Investor Proof of Claim Form, attached hereto as **Exhibit C** and **Exhibit D**, respectively, and the proposed claims procedures for submitting Proofs of Claim, as set forth in the Memorandum of Law in Support of the Motion and proposed Claims Bar Date Order;
4. Direct that any Claimant submitting Claims after the bar date be forever barred, estopped, and enjoined to the fullest extent allowed by applicable law from asserting, in any manner, such claim against the Receivership Entities and their respective estates or property, as provided for in the proposed Claims Bar Date Order; and
5. Grant any such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Stephen F. Del Sesto

Stephen F. Del Sesto, Esq. (Bar #6336)  
Receiver for Patrick Churchville, ClearPath  
Wealth Management, LLC, ClearPath Multi-  
Strategy Fund I, L.P., ClearPath Multi-  
Strategy Fund II, L.P., and ClearPath Multi-  
Strategy Fund III, L.P. and not individually  
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Dated: May 11, 2016

**CERTIFICATE OF SERVICE**

I, Stephen F. Del Sesto, hereby certify that I filed the within document on the 11<sup>th</sup> day of May, 2016, and that notice will be sent electronically to all counsel who are registered participants identified on the Mailing Information for Case No. 15-cv-00191-S-LDA.

/s/ Stephen F. Del Sesto