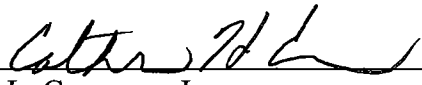


APPENDIX

Defendants Erwin & Johnson, LLP and Christopher Erwin file this Supplemental Appendix of supporting evidence (“Appendix”) contemporaneously with and in support of its Response to Plaintiff’s Reply to Defendants’ Motion For Leave to File a Third-Party Complaint Against DMH Stallard and Christopher J.W. Stenning. The Appendix contains the evidence listed below and attached hereto:

- APP 1 Page 9 of Receiver’s First Set of Interrogatories and Requests for Production to Erwin & Johnson, L.L.P.
- APP 2 Page 10 of Receiver’s First Set of Interrogatories and Requests for Production to Erwin & Johnson, L.L.P.
- APP 3 Page 12 of Receiver’s First Set of Interrogatories and Requests for Production to Erwin & Johnson, L.L.P.

Respectfully submitted,



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**ATTORNEYS FOR DEFENDANTS/
THIRD-PARTY PLAINTIFFS
CHRISTOPHER ERWIN and ERWIN &
JOHNSON, LLP**

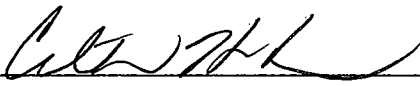
CERTIFICATE OF SERVICE

I hereby certify that on this [27th] day of May, 2009, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants:

Bruce S. Kramer, Esq.
Borod & Kramer, P.C.
80 Monroe Avenue
Suite G1
Memphis, TN 38103

Brent Rodine
Quilling, Selander, Cumiskey & Lownds, P.C.
Bryan Tower, Suite 1800
2001 Bryan Street
Dallas, Texas 75201

Christopher Trowbridge, Esq.
Bell Nunnally & Martin LLP
1400 One McKinney Plaza
3232 McKinney Avenue
Dallas, Texas 75204



Cathlynn H. Cannon

INTERROGATORY NO. 11:

In response to Interrogatory No. 4 in E&J's First Set of Interrogatories, the Receiver specifically identified the fiduciary duties that he believes governed Your activities. If You contend that any of those fiduciary duties did not govern Your activities, state so along with the "specific legal source" for that position.

ANSWER:

INTERROGATORY NO. 12:

Identify all specific instances where You protected the best interests of ABC, its investors, or the ABC Trusts.

ANSWER:

INTERROGATORY NO. 13:

Identify all specific instances where You believe LaMonda acted in a manner that was detrimental to ABC, its investors, or the ABC Trusts.

ANSWER:

INTERROGATORY NO. 14:

Identify all evidence that satisfied You that International Fidelity & Surety Ltd. would actually pay on its bonding obligations to ABC.

ANSWER:

INTERROGATORY NO. 15: ✕

Identify all evidence that satisfied You that Albatross would actually pay on its bonding obligations to ABC.

ANSWER:

INTERROGATORY NO. 16: ✂

Identify all evidence that satisfied You that UniCredit would actually pay on Albatross'

bonding obligations to ABC.

III. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Produce all documents, including any electronic data, that You used to manage the calculation and payment of premiums.

ANSWER:

REQUEST FOR PRODUCTION NO. 2:

Produce all documents, including any electronic data, that You used to manage the collection, calculation, matching, and disbursement of investor funds held for ABC, its investors, or the ABC Trusts. This request includes, but is not limited to, a request for accounting records relating to ABC, SLS, or the ABC Trusts including those stored as electronic data (e.g., Quickbooks files).

ANSWER:

REQUEST FOR PRODUCTION NO. 3:

Produce all opinion letters you sent to investors explaining the tax treatment of distributions.

ANSWER:

REQUEST FOR PRODUCTION NO. 4:

Produce all documents, including billing statements with a description of services performed, for all fees that You charged to ABC, the ABC Trusts, or SLS.

ANSWER:

REQUEST FOR PRODUCTION NO. 11:

Produce all documents supporting Your response to Interrogatory No. 11.

ANSWER:

REQUEST FOR PRODUCTION NO. 12:

Produce all documents evidencing Your response to Interrogatory No. 12.

ANSWER:

REQUEST FOR PRODUCTION NO. 13:

Produce all documents supporting Your response to Interrogatory No. 13.

ANSWER:

REQUEST FOR PRODUCTION NO. 14:

Produce all documents evidencing Your response to Interrogatory No. 14.

ANSWER:

REQUEST FOR PRODUCTION NO. 15:

Produce all documents evidencing Your response to Interrogatory No. 15. ✕

ANSWER:

REQUEST FOR PRODUCTION NO. 16:

Produce all documents evidencing Your response to Interrogatory No. 16. ✕

ANSWER:

REQUEST FOR PRODUCTION NO. 17:

Produce all documents relating to You retaining Data Life and any work that Data Life performed in an effort to calculate ABC's premium obligations.

ANSWER: