

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

SECURITIES AND EXCHANGE COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:05-CV-1328-L (BD)
	§	
MEGAFUND CORPORATION, STANLEY A.	§	ECF
LEITNER, SARDAUKAR HOLDINGS, IBC.,	§	
BRADLEY C. STARK, CIG, LTD., and	§	Referred to the U.S. Magistrate Judge
JAMES A. RUMPF, Individually and d/b/a	§	
CILAK INTERNATIONAL,	§	
	§	
Defendants,	§	
and	§	
	§	
PAMELA C. STARK,	§	
	§	
Relief Defendant.	§	

**RECEIVER’S MOTION TO APPROVE SETTLEMENT AGREEMENT  
WITH URBAN TELEVISION NETWORK CORPORATION**

TO THE HONORABLE JEFF A. KAPLAN, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling (“Receiver”), and files this his Motion to Approve Settlement Agreement with Urban Television Network Corporation. In support of his motion, the Receiver would respectfully show unto the Court as follows:

1. On July 1, 2005, the Securities and Exchange Commission (“SEC”) initiated these proceedings against numerous defendants involved in different levels of a purported investment program. *See Complaint* [Dkt. No. 1]. By order of July 5, 2005 this Court appointed Michael J. Quilling as Receiver for the defendants and relief defendant and he has since continued to function in that capacity. *See Order Appointing Temporary Receiver* (“Order Appointing Receiver”) [Dkt.

No. 9], as amended July 19, 2005 [Dkt. No. 36].

2. The Order Appointing Receiver expressly authorizes legal action to recover funds transferred out of the Receivership Estate:

The Receiver is hereby authorized to institute such actions or proceedings to impose a constructive trust, obtain possession and/or recover judgment with respect to persons or entities who received assets or funds traceable to investor monies.

*Id.* [Dkt. No. 36] at ¶ 13.

3. Accordingly, on December 6, 2005, the Receiver filed a Complaint against Urban Television Network Corporation (“UATV”) seeking to recover \$665,000.00 of investor funds that Megafund sent to them. *See Quilling v. Urban Television Network Corporation*, Civil Action No. 3:05-CV-2395 (N.D. Tex.). UATV filed an Answer denying the Receiver’s allegations. *Defendant’s Original Answer* [Dkt. No. 7] (3:05-CV-2395).

4. Since that time, the parties have entered into a Settlement Agreement wherein UATV assigned to the Receiver all rights, claims, and causes of action against Dove Media Group, Inc. f/k/a World One Media Group, Inc. The proposed Settlement Agreement is attached as Exhibit “A” and fully incorporated for all purposes.

5. The Receiver believes that the assigned claim is UATV’s most valuable transferrable asset and, accordingly, entering into this Settlement Agreement is in the Receivership Estate’s best interests.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that the Court enter an Order approving the proposed Settlement Agreement attached as Exhibit “A” and awarding the Receiver such other and further relief, general or special, at law or in equity, to which he may show

himself justly entitled.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201-4240  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ Brent J. Rodine  
Michael J. Quilling  
Texas State Bar No. 16432300  
Email: [mquilling@qsclpc.com](mailto:mquilling@qsclpc.com)  
Brent J. Rodine  
Texas State Bar No. 24048770  
Email: [brodine@qsclpc.com](mailto:brodine@qsclpc.com)

ATTORNEYS FOR RECEIVER

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Civil Rule 7.1, I participated in separate telephone conferences with the following counsel on October 19, 2006 and they do not oppose the relief requested:

Stephen J. Korotash,  
Attorney for the SEC

Scott Baker  
Attorney for Stanley A. Leitner

Jeffrey L. Cureton  
Attorney for Urban Television Network Corporation

/s/ Brent J. Rodine

**CERTIFICATE OF SERVICE**

This is to certify that on the 19<sup>th</sup> day of October, 2006, a true a correct copy of the above and foregoing has been served on the attorneys for the parties in this matter via electronic notice.

/s/ Brent J. Rodine

This Motion will also be posted on the Receiver's website, [www.secreceiver.com](http://www.secreceiver.com) after filing.