

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

<b>MICHAEL J. QUILLING, Receiver</b>	§	
<b>for Megafund Corporation and</b>	§	
<b>Stanley A. Leitner,</b>	§	
<b>Plaintiff,</b>	§	
	§	
<b>v.</b>	§	<b>Civil Action No. 3:06-CV-1088-L (BD)</b>
	§	
<b>ALLAN CLARK, Individually and</b>	§	<b>ECF</b>
<b>d/b/a FINANCIAL RISK</b>	§	
<b>SPECIALISTS,</b>	§	
<b>Defendant.</b>	§	<b>Referred to the U.S. Magistrate Judge</b>

**DEFENDANT’S MOTION TO APPROVE AGREED ORDER  
EXPANDING THE DEADLINE TO RESPOND TO  
PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

**TO THE HONORABLE JEFF KAPLAN, UNITED STATES MAGISTRATE JUDGE:**

**COMES NOW, ALLAN CLARK, Individually and d/b/a FINANCIAL RISK SPECIALIST (“Defendant”)** and requests that this Court issue an Agreed Order expanding the deadline for Defendant’s Response to Plaintiff’s Motion for Summary Judgment until November 30, 2006. In support, Defendant would respectfully show unto the Court as follows:

1. On November 16, 2006, Defendant initiated a telephone conference with Plaintiff to discuss expanding the deadline for Defendant to file his response to Plaintiff’s Motion for Summary Judgment.

2. The parties have consented to entry of that attached Agreed Order to expand the deadlines as follows: (a) Defendant’s Response to Plaintiff’s Motion for Summary Judgment until **November 30, 2006**; and, (b) Plaintiff’s Reply to Defendant’s Response to Plaintiff’s Motion for Summary Judgment until **December 15, 2006**.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff requests that upon final consideration of this matter that this Court issue an Agreed Order, attached hereto as Exhibit "A".

Respectfully submitted,

**VEON & ENGLAND, L.L.P.**

By: /s/ Austin H. England  
Austin H. England  
Texas State Bar No. 06619750

909 Lake Carolyn Parkway, Suite 150  
Irving, Texas 75039  
Telephone: (214) 522-6262  
Telecopier: (214) 522-8588

**ATTORNEYS FOR ALLAN CLARK**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing instrument has this day been served upon all counsel of record, via electronic case filing system on this the 17<sup>th</sup> day of November, 2006, as follows:

Brent J. Rodine, Esq.  
Quilling, Selander, Cummiskey & Lownds, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201-4240

/s/ Austin H. England  
Austin H. England

**AGREED:**

/s/ Brent J. Rodine  
Brent J. Rodine

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

MICHAEL J. QUILLING, Receiver  
for Megafund Corporation and  
Stanley A. Leitner,  
Plaintiff,

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

v.

Civil Action No. 3:06-CV-1088-L (BD)

ALLAN CLARK, Individually and  
d/b/a FINANCIAL RISK  
SPECIALISTS,  
Defendant.

ECF

Referred to the U.S. Magistrate Judge

**AGREED ORDER ON DEFENDANT’S MOTION TO APPROVE AGREED ORDER  
EXPANDING THE DEADLINE TO RESPOND TO PLAINTIFF’S MOTION FOR  
SUMMARY JUDGMENT**

CAME ON this the \_\_\_\_ day of \_\_\_\_\_, 2006 the Defendant’s Motion to Approve Agreed Order Expanding the Deadline to Respond to Plaintiff’s Motion for Summary Judgment (“Motion”) of **ALLAN CLARK, Individually and d/b/a FINANCIAL RISK SPECIALIST** (“Defendant”). The Court having considered the Motion, the pleadings on file herein and the arguments of counsel is of the opinion that the Motion should in all things be **GRANTED**.

**IT IS THEREFORE ORDERED, ADJUDGED AND DECREED** that Defendant’s deadline to Respond to Plaintiff’s Motion for Summary Judgment is expanded to **November 30, 2006** and Plaintiff’s deadline to reply to Defendant’s Response to Plaintiff’s Motion for Summary Judgment is expanded to **December 15, 2006**.



\_\_\_\_\_  
Magistrate Judge Presiding

**AGREED:**

/s/ Austin H. England

Austin H. England  
Attorney for Defendant

/s/ Brent J. Rodine

Brent J. Rodine  
Attorney for Plaintiff