

**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	§	ECF
d/b/a FINANCIAL RISK	§	
SPECIALISTS,	§	
Defendant.	§	Referred to the U.S. Magistrate Judge

**DEFENDANT’S SECOND 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 December 8, 2006. In support, Defendant would respectfully show unto the Court as follows:

1. On November 29, 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 **December 8, 2006**; and, (b) Plaintiff’s Reply to Defendant’s Response to Plaintiff’s Motion for Summary Judgment until **December 27, 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

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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 29th 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

AGREED:

/s/ Austin H. England

Austin H. England
Attorney for Defendant

/s/ Brent J. Rodine

Brent J. Rodine
Attorney for Plaintiff