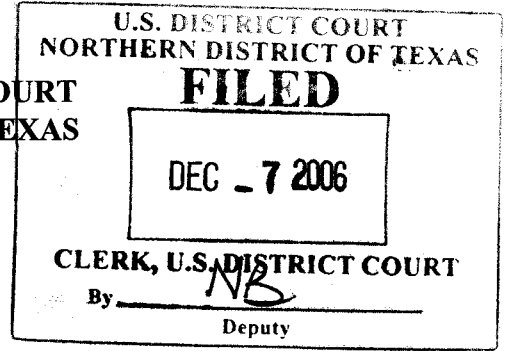


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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**



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

v.

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

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

ECF

Referred to the U.S. Magistrate Judge

**DEFENDANT'S UNOPPOSED MOTION TO APPROVE AN 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 Unopposed Order expanding the deadline for Defendant's Response to Plaintiff's Motion for Summary Judgment until December 22, 2006. In support, Defendant would respectfully show unto the Court as follows:

1. On December 7, 2006, Defendant initiated a telephone conference with Plaintiff to discuss settlement and accordingly an expansion of the deadline for Defendant to file his response to Plaintiff's Motion for Summary Judgment. While the parties understand that Judge Kaplan is disinclined to grant a further extension, the Defendant requests (and Plaintiff is not opposed) that an extension be granted to respond to Plaintiff's Motion for Summary Judgment because the parties have agreed in principle to the settlement of this case and need time to work out the details of

settlement. The Defendant's request for an extension of time is not for purposes of delay but to save the Court's time and attorney's fees and expenses for the parties.

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 22, 2006**; and, (b) Plaintiff's Reply to Defendant's Response to Plaintiff's Motion for Summary Judgment until **January 8, 2007**.

WHEREFORE, PREMISES CONSIDERED, Defendant 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: 

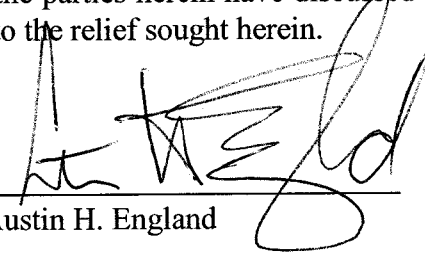
Austin H. England
Texas State Bar No. 06619750

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

ATTORNEYS FOR ALLAN CLARK

CERTIFICATE OF CONFERENCE

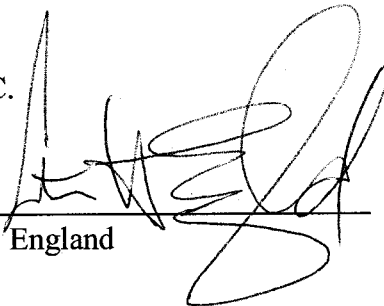
Pursuant to local rule 7.1 counsel for the parties herein have discussed the merits of this motion and Plaintiff's counsel is not opposed to the relief sought herein.


Austin H. England

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 facsimile on this the 7th day of December, 2006, as follows:

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



Austin H. England

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.

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

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

ECF

Referred to the U.S. Magistrate Judge

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

CAME ON this the ___ day of _____, 2006 the Defendant’s Unopposed Motion to Approve An 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 **December 22, 2006** and Plaintiff’s deadline to reply to Defendant’s Response to Plaintiff’s Motion for Summary Judgment is expanded to **January 8, 2007**.



Magistrate Judge Presiding