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

MICHAEL J. QUILLING, RECEIVER FOR MEGAFUND CORPORATION AND LANCORP FINANCIAL GROUP, LLC,	§ § § § §	
Plaintiff,	§ §	Civil Action No. 3:06-CV-0299-(BD)
vs.	§ § §	
KENNETH WAYNE HUMPHRIES,	§ §	**ECF** **Referred to U.S. Magistrate Judge**
Defendant.	§ §	

MOTION TO APPROVE AGREED ORDER EXPANDING THE DEADLINE FOR PREPARING A STIPULATION OF DISMISSAL AND PROPOSED FINAL JUDGMENT

TO THE HONORABLE JEFF KAPLAN, UNITED STATES MAGISTRATE JUDGE:

Michael J. Quilling, as Receiver for Megafund Corporation and Lancorp Financial Group, LLC, ("Plaintiff" or "Receiver") hereby requests that this Court approve the parties' Agreed Order to expand the deadline for preparing a stipulation of dismissal and proposed final judgment. In support of this motion, the Receiver would respectfully show unto the Court as follows:

1.   Since the Receiver obtained full satisfaction of his damages through summary judgment, he now desires to dismiss his remaining causes of action against Defendant. The parties have agreed that an additional two weeks are needed to prepare the stipulation of dismissal and proposed final judgment required by this Court's Order of October 18, 2006 [Dkt. No. 34].

2.   Accordingly, the parties have consented to entry of the Agreed Order attached as Exhibit "A", which would expand the deadline for preparing the stipulation of dismissal and proposed final judgment until November 15, 2006.

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WHEREFORE, PREMISES CONSIDERED, the Receiver respectfully request that this Court issue the Agreed Order attached as Exhibit "A."

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.
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By: /s/ Brent J. Rodine
       Michael J. Quilling
       State Bar No. 16432300
       Brent J. Rodine
       State Bar No. 24048770

       ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

According to Local Rule 7.1, the undersigned counsel conferred with Defendant by telephone on November 1, 2006 and it was determined that both parties agree with the relief requested.

/s/ Brent J. Rodine

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