

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

MICHAEL J. QUILLING, Receiver	§	
for Sardaukar Holdings, IBC and Bradley	§	
C. Stark,	§	Civil Action No. 3:05-CV-1976(BD)
	§	
Plaintiff,	§	
	§	ECF
v.	§	Referred to the U.S. Magistrate Judge
	§	
JOHN W. STARK, JR. and BARBARA	§	
STARK,	§	
	§	(JURY TRIAL DEMANDED)
Defendants.	§	

**MOTION TO APPROVE AGREED ORDER EXPANDING THE DEADLINES
FOR COMPLETING DISCOVERY AND FILING DISPOSITIVE MOTIONS**

TO THE HONORABLE JEFF KAPLAN, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling, the appointed Receiver for Sardaukar Holdings, IBC and Bradley C. Stark, (“Receiver”) and requests that this Court issue an Agreed Order expanding the deadlines for completing discovery and for filing dispositive motions. In support of this motion, the Receiver would respectfully show unto the Court as follows:

1. The parties agree that an additional nine days is needed to conduct depositions and review evidence before filing dispositive motions.
2. Accordingly, the parties have consented to entry of the Agreed Order attached as Exhibit “A” which would expand the deadline for completing discovery until August 25, 2006 and expand the deadline for filing dispositive motions until September 14, 2006.

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
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Brent J. Rodine
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ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

According to Local Rule 7.1, the undersigned counsel conferred with Mark A. Castillo by telephone on August 4, 2006 and it was determined that this motion was unopposed.

/s/ Brent J. Rodine
Brent J. Rodine