IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

SECURITIES AND EXCHANGE	§ 8	
COMMISSION	§	
Plaintiff,	§	
	§	
	§	
v.	§	Case 04:17-CV-00336-ALM
	§	
THURMAN P. BRYANT, III and	§	
BRYANT UNITED CAPITAL FUNDING,	§	
INC., ARTHUR F. WAMMEL, WAMMEL	§	
GROUP, LLC, CARLOS GOODSPEED	§	
a/k/a SEAN PHILLIPS a/k/a GC d/b/a TOP	§	
AGENT ENTERTAINMENT d/b/a/ MR.	§	
TOP AGENT ENTERTAINMENT,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
THURMAN P. BRYANT, JR.,	§	
	§	
Relief Defendant.	§	

RECEIVER'S MOTION FOR LEAVE TO FILE ANCILLARY LITIGATION

In accordance with Paragraph 41 of the Amended Order Appointing Receiver [Dkt. No. 48] (the "Receivership Order"), Jennifer Ecklund, the Court-appointed Receiver (the "Receiver") for Defendants Thurman P. Bryant, III ("Bryant") and Bryant United Capital Funding, Inc. ("BUCF") (Bryant and BUCF, collectively, the "Bryant Defendants") and Defendant Arthur F. Wammel ("Wammel"), Defendant Wammel Group, LLC (the "Wammel Group"), and Wammel Group Holdings Partnership ("WGHP") (together Wammel, Wammel Group, and WGHP, the "Wammel Defendants") receivership estates (together, the "Receivership Estate" or the "Receivership") in the above-captioned case (the "Case"), by and through undersigned counsel, hereby seeks the Court's permission to file ancillary litigation.

In the course of the Receiver's investigation into the Bryant Defendants and the Wammel

Defendants, the Receiver identified several causes of action against various targets. The

Receiver is prepared to file several lawsuits based on her investigation and analysis completed to

date and respectfully requests leave of court to file ancillary litigation to recover, among other

things, fraudulent transfers made by the Bryant Defendants and the Wammel Defendants. The

Receiver also asks for such other and further relief that this Court deems just and proper.

DATED: April 25, 2018.

Respectfully submitted,

THOMPSON & KNIGHT LLP

By: /s/ Timothy E. Hudson

Timothy E. Hudson State Bar No. 24046120 Tim.Hudson@tklaw.com

Mackenzie S. Wallace State Bar No. 24079535 Mackenzie.Wallace@tklaw.com

Mackenzie M. Salenger State Bar No. 24102451 Mackenzie.Salenger@tklaw.com

THOMPSON & KNIGHT LLP One Arts Plaza 1722 Routh Street, Suite 1500 Dallas, Texas 75201 Telephone: (214) 969-1700

Facsimile: (214) 969-1751

COUNSEL TO RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2018, I electronically filed the foregoing document with the Clerk for the United States District Court, Eastern District of Texas. The electronic case filing system (ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. The foregoing document will also be sent to all counsel of record via the method identified below.

/s/ Timothy E. Hudson Timothy E. Hudson

Via Electronic Mail:

COUNSEL FOR PLAINTIFF:

Jason P. Reinsch
U.S. SECURITIES AND EXCHANGE COMMISSION
Fort Worth Regional Office
Burnett Plaza, Suite 1900
801 Cherry Street, Unit #18
Fort Worth, TX 76102-6882
Telephone: (817) 900-2601

Facsimile: (917) 978-4927 reinschi@sec.gov

PRO SE

By Electronic Mail and by Certified Mail, Return Receipt Requested at both known addresses:

Thurman P. Bryant, III
Treybryant03@gmail.com

1535 Sun Mountain, San Antonio, TX 78258

2054 Hidalgo Lane, Frisco, TX 75034

Via Electronic Mail:

Toby M. Galloway WINSTEAD PC 300 Throckmorton Street, Suite 1700 Fort Worth, TX 76102

Telephone: (817) 420-8200 Facsimile: (817) 420-8201 tgalloway@winstead.com James Ardoin JONES WALKER, LLP 811 Main Street, Suite 2900 Houston, Texas 77002 Phone: (713) 437-1811

Fax: (713) 437-1946 jardoin@joneswalker.com

COUNSEL FOR CERTAIN RELIEF DEFENDANTS

PRO SE

By Electronic Mail and by Certified Mail, Return Receipt Requested:

Thurman P. Bryant, Jr. sonny_103@hotmail.com

2 Dogwood Lane, Hilltop Lakes, TX 77871

Via Electronic Mail:

Mark L. Hill
Anna S. Brooks
SCHEEF & STONE, L.L.P.
2600 Network Blvd., Suite 400
Frisco, Texas 75034

Phone: (214) 472-2100 Fax: (214) 472-2150

<u>Mark.Hill@solidcounsel.com</u> <u>Anna.Brooks@solidcounsel.com</u>

COUNSEL FOR CARLOS GOODSPEED

CERTIFICATE OF CONFERENCE

Mackenzie M. Salenger, counsel for the Receiver, and counsel for Plaintiff, conferred on April 25, 2018, in compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for Plaintiff is unopposed to the relief sought in this Motion.

Mackenzie M. Salenger, counsel for the Receiver, and counsel for Certain Relief Defendants conferred on April 25, 2018, in compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for the Wammel Defendants did not respond regarding whether they are opposed or unopposed to the relief sought in this Motion.

Mackenzie M. Salenger, counsel for the Receiver, and Thurman P. Bryant, Jr. conferred on April 25, 2018, despite the fact that the meet and confer requirement is not applicable to *pro se* defendants pursuant to Local Rule CV-7. Mr. Bryant, Jr. is opposed to the relief sought in this Motion.

Mackenzie M. Salenger, counsel for the Receiver, and Defendant Thurman P. Bryant, III conferred on April 25, 2018, despite the fact that the meet and confer requirement is not applicable to *pro se* defendants pursuant to Local Rule CV-7. Defendant Thurman P. Bryant, III is opposed to the relief sought in this Motion.

Mackenzie M. Salenger, counsel for the Receiver, and counsel for Carlos Goodspeed conferred on April 25, 2018, in compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for Carlos Goodspeed is unopposed to the relief sought in this Motion.

/s/ Timothy E. Hudson Timothy E. Hudson