

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
reinschj@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
Mark.Hill@solidcounsel.com
Anna.Brooks@solidcounsel.com

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