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

JENNIFER ECKLUND, RECEIVER,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Ancillary Civil Action No. 4:17-cv-00856
	§	
THURMAN P. BRYANT, JR., and	§	
CARLOS GOODSPEED a/k/a SEAN PHILLIPS	§	
d/b/a TOP AGENT ENTERTAINMENT d/b/a	§	
MR. TOP AGENT ENTERTAINMENT	§	

RECEIVER'S MOTION FOR ENTRY OF AGREED FINAL JUDGMENT AND AGREED ASSET FREEZE AGAINST DEFENDANT CARLOS GOODSPEED

Plaintiff Jennifer Ecklund, in her capacity as the Court-appointed Receiver (the "Receiver") for Defendants Thurman P. Bryant, III and Bryant United Capital Funding, Inc. and Defendant Arthur F. Wammel, Defendant Wammel Group, LLC, and Wammel Group Holdings Partnership receivership estates, respectfully requests that this Court sign and enter the Agreed Final Judgment against Defendant Carlos Goodspeed ("Goodspeed") and the Agreed Asset Freeze against Goodspeed, which are attached hereto as Exhibit A and Exhibit B, respectively.

Pursuant to the Settlement Agreement entered into between the Receiver and Goodspeed, the parties agreed that Goodspeed's failure to honor his payment obligations to the Receiver would result in the entry of the attached Agreed Final Judgment against Goodspeed in favor of the Receiver in the amount of one million and three hundred and seventy thousand dollars (\$1,370,000) and the entry of the attached Agreed Asset Freeze.¹

Goodspeed has failed to make the payment obligations under the Settlement Agreement.

Therefore, the Receiver respectfully requests that the Court sign and enter the attached Agreed

.

¹ The Receiver further notes that Goodspeed has repeatedly failed to provide the Receiver with an accounting of his assets, as required under the Settlement Agreement.

Final Judgment and the Agreed Asset Freeze against Goodspeed. The Receiver further prays for such other and further relief, general or special, at law or in equity, to which she may show herself justly entitled.

DATED: July 27, 2018.

Respectfully submitted,

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

On July 27, 2018, I electronically submitted the foregoing document to the Clerk of the Court for the United States District Court for the Eastern District of Texas using the electronic case filing system of the Court.

/s/ Timothy E. Hudson Timothy E. Hudson

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

JENNIFER ECKLUND, RECEIVER,	§	
	§	
Plaintiff,	§	
	§	
v.	§ A	ncillary Civil Action No. 4:17-cv-00856
	§	
THURMAN P. BRYANT, JR., and	§	
CARLOS GOODSPEED a/k/a SEAN PHILLIPS	§	
d/b/a TOP AGENT ENTERTAINMENT d/b/a	§	
MR. TOP AGENT ENTERTAINMENT	§	

ORDER GRANTING RECEIVER'S MOTION FOR ENTRY OF AGREED FINAL JUDGMENT AND AGREED ASSET FREEZE AGAINST DEFENDANT CARLOS GOODSPEED

On this date, the Court considered the *Receiver's Motion for Entry of Agreed Final Judgment and Agreed Asset Freeze Against Carlos Goodspeed* (the "Motion"). The Court, having considered the Motion, finds that the Motion should be granted. Accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

The relief requested in the Motion is **GRANTED**. The Receiver is granted judgment against Carlos Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent ("<u>Goodspeed</u>") in the amount of \$1,370,000. It is further,

ORDERED, ADJUDGED, and DECREED that the total judgment amount of \$1,370,000 shall bear post-judgment interest incurred as of the date this Judgment is signed at the rate provided for by law. It is further,

ORDERED, ADJUDGED, AND DECREED that the Receiver shall have all writs of execution and other process necessary to enforce this judgment. It is further,

ORDERED, ADJUDGED, AND DECREED that the Court consents to the entry of the Asset Freeze against Goodspeed.

IT IS FURTHER ORDERED that this is a final, appealable order. All relief not granted herein is **DENIED**.

IT IS FURTHER ORDERED that all costs are taxed against the party incurring same.

IT IS SO ORDERED.

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

Plaintiff,

Plaintiff,

S

Ancillary Civil Action No. 4:17-cv-00856

THURMAN P. BRYANT, JR., and
CARLOS GOODSPEED a/k/a SEAN PHILLIPS
d/b/a TOP AGENT ENTERTAINMENT d/b/a
MR. TOP AGENT ENTERTAINMENT

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METER ECKLUND, RECEIVER,

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Ancillary Civil Action No. 4:17-cv-00856

AGREED JUDGMENT

On this day, Jennifer Ecklund, in her capacity as 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 and Carlos Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent represented to the Court that they have agreed to an entry of judgment. This Agreed Judgment is entered into by the Parties under a Settlement Agreement. It is therefore,

ORDERED, ADJUDGED, and DECREED that the Receiver is granted judgment against Carlos Goodspeed a/k/a Sean Phillips d/b/a Top Agent Entertainment d/b/a Mr. Top Agent in the amount of \$1,370,000.00. It is further,

ORDERED, ADJUDGED, and DECREED that the total judgment amount of \$1,370,000.00 shall bear post-judgment interest incurred as of the date this Judgment is signed at the rate provided for by law. It is further,

ORDERED, ADJUDGED, AND DECREED that the Receiver shall have all writs of execution and other process necessary to enforce this judgment.

ORDERED, ADJUDGED, AND DECREED that this Judgment shall not have any effect on the claims and causes of action asserted by the Receiver against any of the other defendants in the above-captioned lawsuit.

All other relief not expressly granted herein is denied.

All costs are taxed against the party incurring same.

IT IS SO ORDERED.

on Tuly 10, 2018.

AGREED:

Timothy E. Hudson

State Bar No. 24046120

Tim.Hudson@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

Mark L. Hill

State Bar No. 24034868

Mark.Hill@solidcounsel.com

SCHEEF & STONE, L.L.P

2600 Network Blvd., Suite 400

Frisco, Texas 75034

Telephone: (214) 472-2100

Facsimile: (214) 472-2150

COUNSEL TO CARLOS GOODSPEED

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

JENNIFER ECKLUND,	§
Plaintiff,	§ § 8
v.	§ CIVIL ACTION NO. 4:17-CV-00856-ALM
	Š
THURMAN P. BRYANT, JR. and	§
CARLOS GOODSPEED a/k/a SEAN	§
PHILLIPS d/b/a TOP	§
ENTERTAINMENT d/b/a MR. TOP	§
AGENT ENTERTAINMENT,	§
D. C. of and	§ .
Defendants.	8

ASSET FREEZE

Plaintiff Jennifer Ecklund, in her capacity as the Court-appointed Receiver (the "Receiver") for Defendants Thurman P. Bryant, III and Bryant United Capital Funding, Inc. and Defendant Arthur F. Wammel, Defendant Wammel Group, LLC, and Wammel Group Holdings Partnership receivership estates, and Defendant Carlos Goodspeed hereby agree to this Asset Freeze.

Assets") are frozen until further order of the Court. Accordingly, all persons and entities with direct or indirect control over any Goodspeed Assets, other than the Receiver, are hereby restrained and enjoined from directly or indirectly transferring, setting off, receiving, changing, selling, pledging, assigning, liquidating or otherwise disposing of or withdrawing such assets. This freeze shall include, but not be limited to, Goodspeed Assets that are on deposit with financial institutions such as banks, brokerage firms, and mutual funds.

[- ().

All banks, brokerage firms, financial institutions, and other persons or entities which have possession, custody or control of any assets or funds held by, in the name of, or for the benefit of, directly or indirectly, and of Carlos Goodspeed that receive actual notice of this Asset Freeze by

A. Not liquidate, transfer, sell, convey or otherwise transfer any assets, securities, funds, or accounts in the name of or for the benefit of Carlos Goodspeed;

B. Not exercise any form of set-off, alleged set-off, lien, or any form of self-help whatsoever;

C. Within five (5) business days of receipt of that notice, file with the Court and serve on the Receiver a certified statement setting forth, with respect to each such account or other asset, the balance in the account or description of the assets as of the close of business on the date of receipt of the notice; and

D. Cooperate expeditiously in providing information to the Receiver, including identifying any individuals in receipt of Receivership funds.

Carlos Goodspeed further agrees to cooperate with and assist the Receiver in the execution of the terms of this Asset Freeze.

DATED: Tuy 27, 2018.

AGREED AS TO FORM AND SUBSTANCE

Plaintiff/Court-Appointed Receiver, Jennifer Ecklund

personal service, facsimile transmission or otherwise shall:

By: Sim Hurs / Counsel of Title: attorney of Record

Date: 7/27/18

Defendant, Carlos Goodspeed

Date: 7-10-18