

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

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SECURITIES AND EXCHANGE COMMISSION, §  
 §  
 Plaintiff, §  
 §  
 v. §  
 §  
 MILLENNIUM BANK, et al., §  
 §  
 Defendants, §  
 and §  
 §  
 UNITED T OF S, LLC, et al., §  
 §  
 Relief Defendants. §

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Case No.: 7:09-cv-050-O

**PLAINTIFF’S REQUEST FOR CLERK TO ENTER DEFAULT AGAINST  
DEFENDANT WILLIAM J. WISE, D/B/A STERLING ADMINISTRATION, D/B/A  
STERLING INVESTMENT SERVICES, D/B/A MILLENNIUM AVIATION**

TO THE CLERK OF THE COURT, THE DEFENDANTS, AND THE RELIEF DEFENDANTS:

Please take notice that Plaintiff Securities and Exchange Commission (“Commission”) hereby requests that the Clerk, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, enter a default against Defendant William J. Wise, d/b/a Sterling Administration, d/b/a Sterling Investment Services, d/b/a Millennium Aviation (together, “Wise”) for failure to answer, plead, or otherwise respond to the Complaint filed in this action.

As set forth in the Declaration of Jennifer D. Brandt, attached below, the Commission caused substituted service of process, in accordance with Fed. R. Civ. Pro. 4(e), to be made on attorney Billy Ravkind pursuant to this Court’s Order dated October 21, 2009, which authorized the Commission to effect service of process on Wise in this manner. Defendant Wise’s answer or other response to the Complaint was due, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), on

November 12, 2009. To date, the Commission has received no answer or other response by Defendant Wise.

Dated: December 1, 2009

Respectfully submitted,

*s/ Jennifer D. Brandt*

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ATTORNEYS FOR PLAINTIFF

**DECLARATION OF JENNIFER D. BRANDT**

I, Jennifer D. Brandt, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am one of the attorneys representing Plaintiff Securities and Exchange Commission (“Commission”) in this action. I have personal knowledge of the following facts and, if called as a witness, could and would testify competently thereto.

2. The Commission filed its Complaint in this action on March 26, 2009.

3. On October 21, 2009, this Court authorized the Commission to effect service of process on Defendant William J. Wise, d/b/a Sterling Administration, d/b/a Sterling Investment Services, d/b/a Millennium Aviation (together, “Wise”) through substituted service on Relief Defendant, Lynn Wise, or her attorney, Billy Ravkind, in accordance with Fed. R. Civ. Pro. 4(e). [Doc. No. 108.]

3. Pursuant to the Court’s Order, on October 23, 2009, the Commission caused attorney Billy Ravkind to be served with the Summons and Complaint in this matter, in accordance with Fed. R. Civ. Pro. 4(e), as a substitute for personal service on Defendant Wise. *See* Proof of Service filed by the Commission [Doc. No. 109].

4. The date by which Defendant Wise was required to answer, plead or otherwise respond to the Complaint in this action, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), was November 12, 2009.

5. The Commission has not been served with any answer or other response to the Complaint by or on behalf of Defendant Wise. Additionally, a review of the Docket for this case in Pacer indicates that no answer or other response to the Complaint has been filed by Wise.

6. Defendant Wise is not an infant or incompetent person or a person in military service or one otherwise exempted under the Soldiers’ and Sailors’ Civil Relief Act of 1940.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2009, at Fort Worth, Texas.

/s/ Jennifer D. Brandt  
Jennifer D. Brandt

**CERTIFICATE OF SERVICE**

I certify that on December 1, 2009, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record according to Fed. R. Civ. P. 5(b)(2).

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/s/Jennifer D. Brandt  
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