



*Application for Allowance of Fees and Reimbursement of Expenses* (the “**Eleventh Interim Fee Application**”) in excess of the prescribed page limit by thirty-four (34) pages so that she may adequately explain the work undertaken by herself and her Retained Professionals, Thompson & Knight LLP and Veritas Advisory Group, Inc., during the Application Period commencing on October 1, 2019 through December 31, 2019.

Local Rule CV-7(a)(2) provides that a non-dispositive motion shall not exceed fifteen pages, absent leave of Court. An extension of the page limit is warranted here. The Receiver’s request for thirty-four (34) additional pages over the page limit is necessitated by the work completed by the Receiver and her Retained Professionals during the Application Period that needs to be briefed. Since October 1, 2019, the Receiver and her team have been working diligently to liquidate the remaining assets of the Receivership Estate, participate in the ongoing clawback and fraudulent transfer litigation, and continue making the first interim distribution to the Net Losing Investors in the amounts set forth in the Receiver’s Amended Net Losing Investor Distribution Schedule. For example, the Receiver and her team: (i) continued to make the approved interim distribution to Net Losing Investors and responding to investor inquiries relating to same; (ii) continued liquidation of the remaining Receivership assets; (iii) continued efforts to enforce and collect on the Court’s Agreed Judgment as to Defendant Carlos Goodspeed in Ancillary Civil Action No. 4:17-cv-00856; (iv) continuing efforts to enforce and collect on the default judgments against certain Transferees in Ancillary Civil Action No. 4:18-cv-00360; (v) maintained a line of communication with investors by updating the Receiver’s website (<http://bucfreceivership.tklaw.com>); (vi) worked with Veritas Advisory Group, Inc. (“**Veritas**”) to perform forensic accounting and coordinating appropriate follow up with respect to various identified accounts and/or persons or entities of interest discovered, as well as to investigate and

determine identifying information as to the BUCF and Wammel Group investors, including amounts invested; (vii) conducted research as to persons and entities of interest based on the Receiver's investigation; (viii) sought and/or reviewed information from named persons and entities of interest based on the Receiver's investigation; (ix) conferred with Defendant Wammel's counsel to discuss going-forward issues; (x) conferred with Defendant Stephen Garrett's counsel to discuss issues relating to the real property located at 8101 South Humble Road, Texas City, Texas 77591; (xi) conferred with Defendant Goodspeed's counsel to discuss going-forward issues; (xii) coordinated settlements with investors and third parties relating to funds received from the Receivership Defendants; (xiii) maintained the Receiver's bank account in accordance with the Receivership Order; (xiv) satisfied on-going, ordinary course obligations of the Receivership Estate in order to maintain the status quo; and (xv) responded to investor inquiries and reviewed information submitted by investors in furtherance of the Receiver's duties pursuant to the Receivership Order. In order to adequately and fully address the significant activity and related progress in carrying out the Receiver's duties under the Receivership Order, it has taken the Receiver approximately forty-nine (49) pages to do so. Considering the importance of explaining the Receiver and her Retained Professionals' significant activities undertaken during the Application Period, the thirty-four (34) additional pages are warranted. Further, the Receiver's request is made in good faith.

For those reasons, the Receiver's *Eleventh Interim Fee Application* exceeding the standard page limitation by approximately thirty-four (34) pages was necessary to fully address the significant activity and related progress of the Receiver and her Retained Professionals during the Application Period. Accordingly, and for the reasons set forth above, the Receiver respectfully requests that this Court enter an order granting her leave to file the *Eleventh Interim*

*Fee Application for Allowance of Fees and Reimbursement of Expenses* in excess of the page limit prescribed by the Local Rules. 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: February 13, 2020.

Respectfully submitted,

By: /s/ Mackenzie S. Wallace

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 13, 2020, 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/ Mackenzie S. Wallace*  
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**CERTIFICATE OF CONFERENCE**

Mackenzie M. Salenger, counsel for the Receiver, and counsel for Plaintiff conferred on February 13, 2020, 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, attempted to confer with counsel for the Wammel Defendants on February 12-13, 2020, in compliance with the meet and confer requirement in Local Rule CV-7(h). Counsel for the Wammel Defendants did not respond regarding whether he is opposed or unopposed to the relief sought in this Motion.

Mackenzie M. Salenger, counsel for the Receiver, and counsel for Carlos Goodspeed conferred on February 13, 2020, 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/ Mackenzie S. Wallace  
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