

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**  
Plaintiff,

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

v.

Case No.: 3:16-cv-01735-D

**CHRISTOPHER A. FAULKNER, et al.,**  
Defendants,

and

**TAMRA M. FREEDMAN and  
JETMIR AHMEDI,**  
Relief Defendants.

---

**RECEIVER’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO OBJECTION(S) TO PROPOSED PLAN OF DISTRIBUTION**

---

Thomas L. Taylor III (“Receiver”), Court-appointed temporary receiver, respectfully files this Motion for Extension of Time (“Motion”) with respect to the deadline to respond to the Objection (ECF No. 429) (“Objection”) of PDM Holdings, LLC (“PDM Holdings”) to the Receiver’s proposed Plan of Distribution and to any subsequent objections to the Receiver’s proposed Plan of Distribution filed by potential claimants to the Receivership estate.

1. This Court previously ordered that “on or before June 5, 2019 the Receiver shall (1) serve a ... “Notice of Plan” ... on all potential claimants ...; and (2) cause to be published for one day in The Dallas Morning News and the national edition of the Wall Street Journal a notice of the Plan Motion consistent with the Notice of Plan.” ECF No. 424 at p. 2. The Court further ordered “that the Receiver shall file with the Court a certificate of service certifying the completion of the foregoing service of notice to potential claimants.” *Id.* The Receiver caused notice to be

published in The Dallas Morning News and the national edition of the Wall Street Journal consistent with the Notice of Plan on May 1 and May 3, 2019, respectively. The Receiver has served by mail many notices on potential claimants to the Receivership estate as identified in records of the Receivership entities and certain third-parties, the Receiver's identification of, and notice to, potential claimants in this regard remains ongoing.

2. On April 25, 2019 PDM Holdings filed its Objection. Pursuant to the Local Rules for the Northern District of Texas, a response is due by the 21st day after papers are filed with the Court. LR 7.1(e). Accordingly, the Receiver's response to the Objection is due on or before May 16, 2019.

3. Upon the completion of the notice to potential claimants to the Receivership estate, and the filing of a certificate of service certifying the completion of same, potential claimants to the Receivership estate will have 21 days to file objections to the Receiver's proposed Plan of Distribution. *See* ECF No. 424 at p. 2.

4. The Receiver requests that the Court extend the deadline to respond to the PDM Holdings Objection, and to any other objection that is filed within 21 days of the Receiver's to-be-filed certificate of service, to the 42<sup>nd</sup> day after the Receiver files his certificate of service to potential claimants to the Receivership estate. This would ensure any potential claimant has a minimum of 21 days after notice to file an objection, and give the Receiver a minimum of 21 days to file a response, consistent with the Local Rules.

Dated: May 14, 2019

Respectfully submitted,

THE TAYLOR LAW OFFICES, PC

Thomas L. Taylor III  
Texas Bar: 19733700  
*taylor@iltaylorlaw.com*

245 West 18th Street  
Houston, Texas 77008  
Tel: 713.626.5300  
Fax: 713.402.6154

COURT-APPOINTED RECEIVER

GOFORTH LAW, PLLC

By:     /s/ Andrew M. Goforth    

Andrew M. Goforth  
Texas Bar: 24076405  
*andrew@goforth.law*

7614 Fairdale Lane  
Houston, Texas 77063  
Tel: (713) 464-2263  
Fax: (713) 583-1762

COUNSEL FOR RECEIVER

### **CERTIFICATE OF CONFERENCE**

I certify that on May 14, 2019 I conferred with counsel for Plaintiff Securities and Exchange Commission, counsel for Defendant Parker Hallam, and with Paula D. Morris, Manager of PDM Holdings, LLC, who do not oppose the relief sought herein.

    /s/ Andrew M. Goforth      
Andrew M. Goforth

### **CERTIFICATE OF SERVICE**

I certify that on May 14, 2019 I (1) filed the foregoing document through the Court's CM/ECF filing system, which satisfies service requirements under FED. R. CIV. P. 5(b)(2)(E); and (2) mailed the foregoing to PDM Holdings, LLC.

    /s/ Andrew M. Goforth      
Andrew M. Goforth

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**  
Plaintiff,

v.

**CHRISTOPHER A. FAULKNER, et al.,**  
Defendants,

and

**TAMRA M. FREEDMAN and  
JETMIR AHMEDI,**  
Relief Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Case No.: 3:16-cv-01735-D

**ORDER GRANTING RECEIVER’S UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO OBJECTIONS TO  
PROPOSED PLAN OF DISTRIBUTION**

On this date, the Court considered the Receiver’s May 14, 2019 Unopposed Motion for Extension of Time to File Response to Objection(s) to Proposed Plan of Distribution (the “Motion”). The Court, having considered the Motion, finds that the Motion should be granted.

**IT IS THEREFORE ORDERED** that the relief requested in the Motion is **GRANTED** in all respects.

**IT IS FURTHER ORDERED** that with respect to any objection to the Receiver’s proposed Plan of Distribution now filed, or filed on or before the 21st day after the Receiver files his certificate of service regarding the proposed Plan of Distribution, the Receiver’s response(s) shall be deemed timely if filed on or before the 42nd day after the Receiver files said certificate of service.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2019.

---

SIDNEY A. FITZWATER  
UNITED STATES DISTRICT JUDGE