

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

|   |   |                     |
|---|---|---------------------|
| THOMAS L. TAYLOR, III, in his capacity    | § |                     |
| as Court-appointed temporary receiver for | § |                     |
| Breitling Energy Corp. et al.,            | § |                     |
|   | § |                     |
| Plaintiff                                 | § |                     |
|   | § |                     |
| v.  | § | NO. 3:19-cv-01594-D |
|   | § |                     |
| ROTHSTEIN KASS P.A. d/b/a ROTHSTEIN       | § |                     |
| KASS & CO. P.C.; ROTHSTEIN KASS &         | § |                     |
| COMPANY, PLLC and BRIAN MATLOCK,          | § |                     |
|   | § |                     |
| Defendants.                               | § |                     |

**STIPULATION AND [PROPOSED] ORDER REGARDING DOCUMENT  
PRODUCTION AND MOTION FOR SUMMARY JUDGMENT BRIEFING**

WHEREAS Defendants filed a motion for summary judgment (“MSJ”) on December 8, 2020 (Dkt. 95);

WHEREAS Plaintiff’s MSJ response is currently to be filed by January 12, 2021, and Defendants’ MSJ reply is currently to be filed by February 2, 2021 (Dkt. 86);

WHEREAS the Court ordered Plaintiff to produce certain documents no later than January 11, 2021 (Dkt. 97 at \*7);

IT IS HEREBY STIPULATED AND AGREED by Defendants Rothstein, Kass & Company, PLLC, Rothstein-Kass P.A. d/b/a Rothstein Kass & Company, P.C., (collectively, “Rothstein Kass”) and Brian Matlock (together, “Defendants”), and Plaintiff Thomas L. Taylor III (the “Receiver”) (collectively, the “Parties”), solely in his capacity as temporary Receiver of the Breitling group of companies, as follows.

1. Plaintiff’s MSJ Response may exceed the 50 page limit by up to 10 pages;

2. Plaintiff may produce the documents referenced in the Court's December 11, 2020, Order (Dkt. 97) by no later than January 27, 2021;
3. Defendants' MSJ Reply may exceed the 25 page limit by up to 10 pages;
4. Defendants may file their MSJ reply by no later than February 9, 2021.

SO ORDERED this \_\_\_\_ day of January, 2021

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**SIDNEY A. FITZWATER**  
**UNITED STATES DISTRICT JUDGE**

Agreed as to form:

Dated: January 7, 2021

*/s/ Nicolas Morgan*  
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*Attorneys for Defendants*

STIPULATION AND [PROPOSED] ORDER RE DOCUMENT PRODUCTION AND  
MOTION FOR SUMMARY JUDGMENT BRIEFING

*Rothstein Kass P.A. d/b/a Rothstein Kass &  
Co. P.C., Rothstein, Kass & Company, PLLC,  
and Brian Matlock*

Dated: January 7, 2021

*/s/ Edward C. Snyder*

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*Thomas L. Taylor, III*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served to all counsel of record in accordance with the Federal Rules of Civil Procedure on January 7, 2021 via ECF notification.

*/s/ Nicolas Morgan* \_\_\_\_\_

Nicolas Morgan