

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**IN RE: ALL FUNDS ON DEPOSIT IN)
ACCOUNT NUMBER 000669829075 in)
THE BANK OF MM APMC BANQUE DE)
COMMERCE, INC., AT NATIONSBANK,)
N.A., CONSISTING OF \$18,756,420.97,)
MORE OR LESS.)**

C.A. NO. 3:98mc96-McK

GEORGE AND DOLORES ROLLAR,)

Plaintiffs,)

v.)

C.A. NO. 3:01CV205-McK

UNITED STATES OF AMERICA, et al.,)

Defendants.)

RICHARD VASQUEZ,)

Intervener.)

UNOPPOSED MOTION TO CONVEY SEIZED FUNDS TO RECEIVER

TO THE HONORABLE H. BRENT McKNIGHT, UNITED STATES MAGISTRATE JUDGE:

Comes now, the Receiver appointed by the Court in these proceedings and files this Unopposed Motion to Convey Seized Funds to Receiver and in support of such would show the Court as follows:

1. On October 11, 2001 the Court issued its Consent Order regarding the appointment of a receiver in these proceedings. Thereafter, on October 29, 2001 the Court issued its Order

Appointing Receiver pursuant to which Michael J. Quilling was specifically appointed to serve as receiver in this case.

2. Since his appointment, the Receiver and his staff have been diligently trying to ascertain the identity of claimants to the seized funds which are the subject of these proceedings. Significant progress has been made and will be reported to the Court in more detail in the near future.

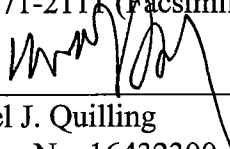
3. In anticipation of being able to recommend distributions to various investors for approval by the Court in the near future, the parties to these proceedings have agreed that the distribution process will be expedited if the seized funds currently being held by the U.S. Marshals Service are transferred, in their entirety, to the Receiver for holding subject to further orders of this Court. The Receiver is advised that the U.S. Marshals Service is currently holding \$16,565,958.91 plus accrued interest.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that the Court enter an Order authorizing the transfer of all remaining seized funds relating to these proceedings to the Receiver and for such other and further relief, general or specific, at law or in equity, to which the Receiver may show himself justly entitled.

Respectfully submitted,

QUILLING, SELANDER, CUMMISKEY
& LOWNDS, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201-4240
(214) 871-2100 (Telephone)
(214) 871-2111 (Facsimile)

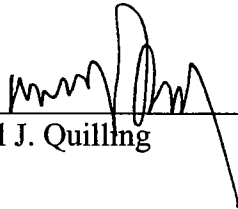
By:



Michael J. Quilling
State Bar No. 16432300
ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

Prior to filing this Motion, I conferred with all counsel of record. None of them oppose the Motion.



Michael J. Quilling

CERTIFICATE OF SERVICE

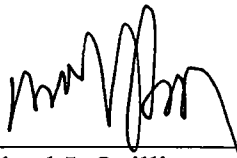
I hereby certify that on the 6th day of August, 2002 a true and correct copy of the foregoing document was served via first class mail, postage pre-paid, on:

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This Application will also be posted on the Receiver's website, www.secreceiver.com, immediately after filing.



Michael J. Quilling