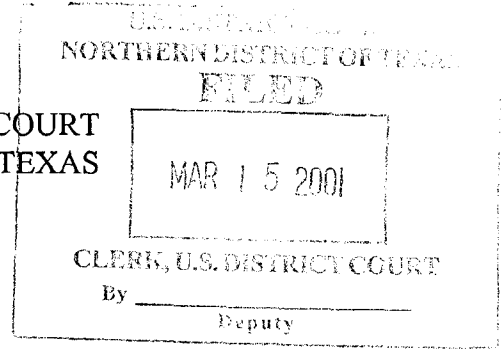


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

FUNDING RESOURCE GROUP, a/k/a FRG Trust;
QUENTIN HIX; GENE COULTER; STEVEN C.
ROBERTS; MVP NETWORK, INC., a Texas corporation,
a/k/a MVP Network (Trust); FMCI TRUST; FUNDERS
MARKETING COMPANY, INC., a Texas corporation;
RAYMOND G. PARR; WILLARD VEARL SMITH;
EARL D. McKINNEY; FORTUNE INVESTMENTS,
LTD., a Nevada corporation; ROBERT CORD, a/k/a
Robert F. Schoonover, Jr.; WINTERHAWK WEST
INDIES, INC.; IGW TRUST; CAROLYN
DON HICKS; and CARL LaDANE WEAVER,

Defendants,

and

HOWE FINANCIAL TRUST, an Indiana corporation;
TREDS FINANCIAL TRUST; and
MARY ANN BAUCE,

Defendants Solely for Purposes
of Equitable Relief.

CIVIL ACTION NO.
3:98-CV-2689-M

**RECEIVER'S UNOPPOSED MOTION TO SELL VEHICLE
FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES**

TO THE HONORABLE JEFF KAPLAN,
UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling ("Receiver"), and files this his Unopposed Motion to
Sell Vehicle Free and Clear of All Liens, Claims and Encumbrances, and in support of such would
respectfully show unto the Court as follows:

1. On November 13, 1998, the Securities and Exchange Commission ("SEC") initiated these proceedings and in connection therewith sought the appointment of a receiver as to the defendants and equity relief defendants. By order dated November 13, 1998 in these proceedings, Michael J. Quilling was appointed as the receiver and has continued to serve in that capacity.

2. One of the assets the Receiver has found and taken possession of is a 1994 Chrysler LHS, VIN # 2C3ED56F0RH279630 ("Chrysler"). The Chrysler currently remains in the possession of the Receiver.

3. Title to the Chrysler is currently in the name of Howe Financial Trust.

4. Subsequent to his appointment as Receiver for Howe Financial Trust, the Receiver has been actively marketing the Chrysler for sale. As a result of those marketing efforts, the Receiver has received an offer from Chris Waddell to purchase the Chrysler in the amount of \$5,000.00, subject to final approval by this Court. It is the belief of the Receiver that the purchase price represents fair market value of the Chrysler, and a sale at the offer price is in the best interest of the receivership estate. Accordingly, the Receiver requests that the Court authorize him to sell the Chrysler, free and clear of all liens, claims and encumbrances, to Chris Waddell. All valid liens, claims and encumbrances will attach to the net proceeds of sale subject to further Order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that the Court enter an order authorizing him to sell the Chrysler to Chris Waddell and consummate a contract for sale consistent with the foregoing, and for such other and further relief, general or special, 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

(214) 871-2100 (Telephone)

(214) 871-2111 (Facsimile)

By: 

Michael J. Quilling

State Bar No. 16432300

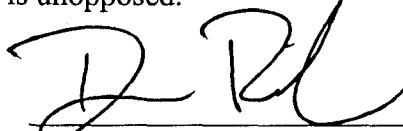
D. Dee Raibourn, III

State Bar No. 24009495

ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

I certify that I have spoken with Bob Brunig of the Securities and Exchange Commission regarding the merits of this motion, and he is unopposed.



D. Dee Raibourn, III

CERTIFICATE OF SERVICE

I hereby certify that on the 15th of March, 2001, a true and correct copy of the foregoing document was served via first class mail, postage pre-paid, on the persons and entities on the attached service list.



D. Dee Raibourn, III