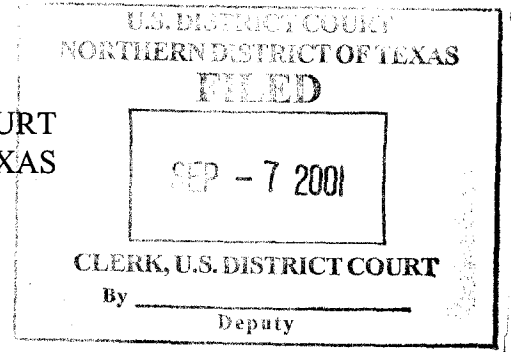


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



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 1997 Toyota 4Runner, VIN # JT3GN87RXV0047874 ("4Runner"). The 4Runner currently remains in the possession of the Receiver.

3. Title to the 4Runner is currently in the name of Raymond G. Parr.

4. Subsequent to taking possession of the 4Runner, the Receiver has been actively marketing the it for sale. As a result of those marketing efforts, the Receiver has received an offer from Jeff Bayer to purchase the 4Runner in the amount of \$12,000.00, subject to final approval by this Court. The 4Runner has high mileage for its age and is in need of substantial mechanical and body repairs. It is the belief of the Receiver that the purchase price represents fair market value of the 4Runner, 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 4Runner, free and clear of all liens, claims and encumbrances, to Jeff Bayer. 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 4Runner to Jeff Bayer 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 7<sup>th</sup> of September, 2001, a true and correct copy of the foregoing document was served via first class mail, postage pre-paid, on the persons below:

Robert B. Brunig Securities & Exchange Commission 801 Cherry Street, 19th Floor Fort Worth, Texas 76102	Deborah Goodall Goodall & Sooter 12830 Hillcrest Rd., Suite 111 Dallas, Texas 75230
Wendell A. Odom, Jr. 440 Louisiana, Suite 800 Houston, Texas 77002	Dan R. Waller Secore & Waller, LLC 13355 Noel Road, Suite 2290 Dallas, Texas 75240
Raymond Parr 15455 Point Northwest Blvd. Apartment Number 507 Houston, Texas 77095	

  
D. Dee Raibourn, III