

RECEIVER'S PROPOSED LITIGATION BUDGET

TO THE HONORABLE JEFF KAPLAN, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling ("Receiver") and, pursuant to this Court's Order entered on December 14, 2000, submits this his proposed litigation budget:

Nature of Action And Good Faith Recovery Estimate

This is an action by the Receiver to recover \$502,000.00 of investor monies diverted by receivership defendant David Gilliland (through a number of entities controlled by him) to a broker who brought investors into the programs run by Gilliland. If the Receiver is successful in obtaining a judgment it is believed that the defendants have the financial ability to pay it.

Litigation Budget

<u>Stage</u>	Total Hours (<u>Estimate</u>)	Attorney Compensation (Hourly Rate)	Estimated <u>Costs</u>	<u>Total</u>
Preliminary Investigation	Completed			
Legal Research	50	\$150.00	\$ 100.00	\$ 7,600.00
Pleading Preparation	Completed			
Formal Discovery	30	\$250.00	\$5,000.00	\$12,500.00
Expert Witnesses	Unknown at this time			
Dispositive Motions	50	\$250.00	\$ 100.00	\$12,600.00
Trial Preparation	20	\$250.00	\$ 500.00	\$ 5,500.00
Trial	40	\$250.00	\$ 300.00	\$ <u>10,300.00</u>
Total Estimated Fees and Costs:			\$ <u>48,500.00</u>	

DATED THIS _____day of January 2001.

Respectfully submitted

sy:____

Michael J. Quilling

State Bar No. 16432300

QUILLING, SELANDER, CUMMISKEY,&

LOWNDS, P.C.

2001 Bryan Street, Suite 1800 Dallas, Texas 75201-4240

(214) 871-2100 (Telephone)

(214) 871-2111 (Facsimile)

CERTIFICATE OF SERVICE

A true and correct copy of this document was mailed on _______ day of January, 2001, via first class mail to the following:

Robert B. Brunig Securities & Exchange Commission 801 Cherry Street, 19th Floor Fort Worth, Texas 76102 Bobby Forshey Forshey & Prostok L.L.P. 301 Commerce, Suite 1150 Dallas, Texas 75225

R. C. Wuestling Wuestling & James, L.C. 1015 Locust Street, Suite 730 St. Louis, Missouri 63101

Michael J. Quilling