

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 June 28, 2000, submits this his proposed litigation budget:

Nature of Action And Good Faith Recovery Estimate

This is an action by the Receiver to recover \$200,000.00 of investor monies given by receivership defendant Robert Cord (through an entity called Saber Industries) to defendant Morgan Weinstein & Co. The Receiver anticipates recovery of the \$200,000.00, plus pre-judgment interest (currently estimated to be \$42,000.00), reasonable attorneys fees and costs of court. The Defendants have already tendered \$152,000.00 to the Receiver to settle the case, which offer has been rejected. It is anticipated that this case will ultimately be settled.

Litigation Budget

Stage	Total Hours (<u>Estimate</u>)	Attorney Compensation (Hourly Rate)	Estimated <u>Costs</u>	<u>Total</u>
Preliminary Investigation	Completed	ar		
Legal Research	20	\$150.00	\$ 100.00	\$ 3,100.00
Pleading Preparation	Completed			
Formal Discovery	30	\$250.00	\$5,000.00	\$12,500.00
Expert Witnesses	None Anticipated			
Dispositive Motions	30	\$250.00	\$ 100.00	\$ 7,600.00
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:			\$39,000.00	

DATED this $\frac{25+10}{2}$ day of July 2000.

Respectfully submitted,

Michael J. Quilling

State Bar No. 16432300

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LOWNDS, P.C.

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CERTIFICATE OF SERVICE

A true and correct copy of this document was mailed on July 25, 2000, via first class mail to the following:

Robert B. Brunig Securities & Exchange Commission 801 Cherry Street, 19th Floor Fort Worth, Texas 76102

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Michael J. Quilling