

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

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
JUL 25 2000
NANCY DOHERTY, CLERK

Michael J. Quilling, Receiver for §
Robert Cord, Winterhawk West Indies, §
Inc., and Steven C. Roberts d/b/a §
Funding Resources Group and FRG Trust, §

Plaintiff, §

v. §

Texas Coastal Bank and §
Billy Holcomb, §

Defendants. §

Civil Action No: 3:99-CV-1504-M

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 avoid a security interest claimed by Texas Coastal Bank against \$1,000,000.00 of Certificates of Deposit and to recover at least \$10,000,000.00 of damages against Texas Coastal Bank. The Receiver estimates that he should be able to recover at least the Certificates of Deposit and that Texas Coastal Bank can pay any judgment entered against it up to the value of its net worth.

Litigation Budget

| <u>Stage</u> | <u>Total Hours (Estimate)</u> | <u>Attorney Compensation (Hourly Rate)</u> | <u>Estimated Costs</u> | <u>Total</u> |
|--|--|---|-----------------------------------|---------------------|
| Preliminary Investigation | Completed | | | |
| Legal Research | 200 | \$150.00 | \$ 1,000.00 | \$31,000.00 |
| Pleading Preparation | Completed | | | |
| Formal Discovery | 200 | \$250.00 | \$25,000.00 | \$75,000.00 |
| Expert Witnesses | 50 | \$250.00 | \$25,000.00 | \$37,500.00 |
| Dispositive Motions | 60 | \$250.00 | \$ 500.00 | \$15,500.00 |
| Trial Preparation | 100 | \$250.00 | \$ 500.00 | \$25,500.00 |
| Trial | 250 | \$250.00 | \$ 3,000.00 | <u>\$65,500.00</u> |
| Total Estimated Fees and Costs: | | | | \$250,000.00 |

DATED this 25th day of July 2000.

Respectfully submitted,

By: 

Michael J. Quilling
State Bar No. 16432300

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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
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Michael J. Quilling