

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

GEORGE AND DOLORES ROLLAR, §
§
Plaintiffs, §
v. §
§
UNITED STATES OF AMERICA, et al., §
§ Civil Action No. 3:01CV205-McK
Defendants, §
v. §
§
RICHARD VASQUEZ, §
§
Intervener. §

**RECEIVER'S UNOPPOSED APPLICATION TO PURSUE
FUNDS FROZEN IN NORWAY**

TO THE HONORABLE H. BRENT MCKNIGHT, UNITED STATES MAGISTRATE JUDGE:

COMES NOW, Michael J. Quilling ("Receiver") and files this his Application to Pursue Funds Frozen in Norway and in support of such would respectfully show unto the Court as follows:

1. On October 11, 2001, the Court issued its Consent Order regarding the Appointment of a receiver in these proceedings ("Consent Order"). Thereafter, On October 29, 2001, the Court issued its Order Appointing Receiver pursuant to which Michael J. Quilling was specifically appointed to serve as Receiver in the case.

2. Pursuant to Paragraph 1. of the Consent Order, the Receiver was "authorized and directed to apply to the Court for such other Orders as may be necessary and appropriate to carry out [his] duties and the mandate of the Court".

3. In connection with performing his duties, the Receiver has been advised that the National Authority for Investigation and Prosecution of Economic and Environmental Crime in Norway (“ØKOKRIM”) has seized approximately \$356,000.00 plus interest which is directly traceable out of the account and funds which are the subject of these proceedings. In that regard, ØKOKRIM has provided the Receiver with a tracing of the funds. Based upon the Receiver’s review of the tracing, it does not appear that such funds involve any other claimants or creditors other than those which are already properly part of these proceedings. Accordingly, the Receiver believes that it is appropriate to have such funds turned over to the Receiver for administration along with the other funds which are the subject of these proceedings. ØKOKRIM has expressed preliminary agreement to transfer such funds to the Receiver. In order to accomplish such a transfer, the Receiver requests authority from this Court pursuant to the provision of the Consent Order quoted above, to pursue such action.

4. The Receiver has discussed this matter with counsel for the Plaintiffs, Rodney Alexander, counsel for the Intervener, Frank Whitney and counsel for the United States, Bill Brafford, and none of them oppose this Application.

WHEREFORE PREMISES CONSIDERED, the Receiver requests that he be given authority to pursue such actions as are necessary to accomplish a transfer of the funds frozen in Norway 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,

By:



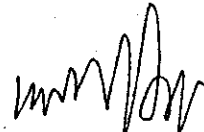
Michael J. Quilling
State Bar No. 16432300

Quilling, Selander, Cumiskey & Lownds
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
(214) 871-2100 (Telephone)
(214) 871-2111 (Fax)

ATTORNEYS FOR THE RECEIVER

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with all counsel of record regarding this Application and none of them opposed the relief requested.



Michael J. Quilling

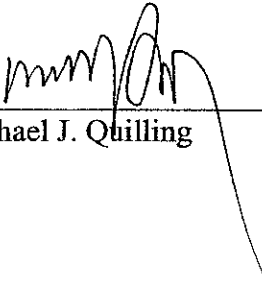
CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of December, 2001 a true and correct copy of the foregoing document was served via first class mail, postage pre-paid, on:

Rodney Alexander
Mayer, Brown & Platt
100 North Tyron Street
Suite 2400
Charolotte, North Carolina 28202

William A. Brafford
United States Attorney
227 west Trade Street, Suite 1700
Charlotte, North Carolina 28202

Frank Whitney
Kilpatrick Stockton, L.L.P.
301 South College
Suite 3500
Charlotte, North Carolina 28202



Michael J. Quilling