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4 Permanent Receiver
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**

11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 vs.
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15 DIVERSIFIED LENDING GROUP,
INC.; APPLIED EQUITIES, INC.; AND
16 BRUCE FRIEDMAN,

17 Defendants,

18 and

19 TINA M. PLACOURAKIS,
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21 Relief Defendant.
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Case No. CV 09-01533-R (SSx)

**NOTICE OF MOTION AND
MOTION OF RECEIVER FOR
DISALLOWANCE OF
DUPLICATE CLAIMS, (B)
EXTENDING LAST DATE TO
FILE CLAIMS TO JULY 10, 2010
AND (C) TO RECOMMEND A
PROCEDURE TO RESOLVE
CLAIMS DISPUTES);
DECLARATION OF DAVID A.
GILL**

Date: November 1, 2010
Time: 10:00 a.m.
Place: Courtroom "8"
Hon. Manuel Real

23
24 **PLEASE TAKE NOTICE THAT** on November 1, 2010, at 10:00 a.m. in
25 Courtroom "8" of the above-captioned Court, I, David A. Gill, the Permanent
26 Receiver ("Receiver") of Diversified Lending Group, Inc. ("DLG"), Applied
27 Equities, Inc. ("AEI"), and their subsidiaries and affiliates, including but not limited
28 to MMHIM, Inc., DLG International, a Panamanian Company, and Sun West

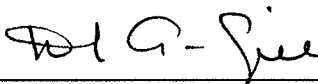
1 Bottlers, LLC (collectively "Diversified"), will move and hereby moves the Court
2 ("Motion") for an order disallowing duplicate claims, as detailed in Exhibit "C" to
3 the Declaration of David A. Gill and at the next page of this Notice, extending the
4 Claims Bar Date to July 10, 2010, establishing procedures to litigate objections to
5 claims and approving the manner of notice of this motion.

6 **NOTICE IS HEREBY FURTHER GIVEN**, that the Motion is made on the
7 grounds set forth in the attached Motion and the Declaration of David A. Gill filed
8 therewith. A proposed order is filed therewith.

9 **PLEASE TAKE FURTHER NOTICE** that any interested party may request
10 paper or electronic copies of the entire service package by contacting me in writing,
11 and I will comply with all such requests by first-class mail. A copy of this Notice
12 and the Motion can be viewed by accessing the Receiver's website at
13 *www.DiversifiedReceivership.com*. Inquiries may be directed to the Receiver's
14 office at the above address, attention Ms. Jessica Ramos, Paraprofessional.

15 **NOTICE IS HEREBY FURTHER GIVEN** that Local Rule 67-9 requires
16 that, not later than 14 days before the date designated for the hearing on the Motion,
17 any party who opposes the Motion to file with the Court and serve upon the Receiver
18 such opposing party's response to the Motion. Failure to comply with this
19 requirement, as set forth in the Local Rules of the Court, may be deemed by the
20 Court to be consent to the granting of the Motion.

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22 Dated: October 1, 2010

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24 _____
25 David A. Gill, Receiver
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**Receivership of Diversified Lending Group, Inc.
Duplicate Claims**

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
1089	Gregory, John F	07-01401	05/28/10	\$ 58,048.34	X
1088	Gregory, John F	07-01401	05/28/10	\$ 58,048.34	
Total Allowable Claim				\$ 58,048.34	

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
501	Hickham, Robert H. Hickam Defined Benefit Pension Plan FBO Harold D. Meek	07-01609	04/02/10	\$ 106,127.00	X
596	Hickham, Robert H. Hickam Defined Benefit Pension Plan FBO Harold D. Meek	07-01609	04/14/10	\$ 108,665.00	
546	Hickham, Robert H. Hickam Defined Benefit Pension Plan FBO Robert Hickam	07-01608	04/12/10	\$ 184,296.00	
Total Allowable Claim				\$ 292,961.00	

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
917	Ivie, Kraig S	07-01408	05/24/10	\$2,200,000.00	X
918	Ivie, Kraig S	07-01408	05/24/10	\$2,200,000.00	
Total Allowable Claim				\$2,200,000.00	

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
608	Kotal Trust Dated Aug. 19, 1998, Edward Kotal & Edith M. Kotal, TTEES	07-00117	04/19/10	\$ 433,168.25	X
1011	Kotal Trust Dated Aug. 19, 1998, Edward Kotal & Edith M. Kotal, TTEES	07-00117	05/27/10	\$ 433,168.25	
Total Allowable Claim				\$ 433,168.25	

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
571	Warner, Wynne Natalie	07-01472	04/12/10	\$ 323,785.02	X
642	Warner, Wynne Natalie	07-01472	04/22/10	\$ 323,785.02	
Total Allowable Claim				\$ 323,785.02	

Claim No.	Creditor	DLG Account No.	Date	Claim Amount	Claim to Disallow
572	Warner, Wynne Warner Trust, Dated August 24, 1990	07-01586;08-01226;08-01321;08-01358	04/12/10	\$ 665,376.50	X
643	Warner, Wynne Warner Trust, Dated August 24, 1990		04/22/10	\$ 665,376.50	X
655	Warner, Wynne Warner Trust, Dated August 24, 1990	07-01586;08-01226;08-01321;08-01358	04/26/10	\$ 665,376.50	
Total Allowable Claim				\$ 665,376.50	

1 The undersigned, David A. Gill, the Permanent Receiver (the "Receiver") of
2 Diversified Lending Group, Inc. and Applied Equities, Inc., and their subsidiaries
3 and affiliates, hereby moves that duplicate claims be disallowed, that the last date to
4 file claims be retroactively extended to July 10, 2010, and that a procedure be
5 established to resolve claims disputes

6 I.

7 INTRODUCTION

8 1. I am the Permanent Receiver appointed by this Court for Diversified
9 Lending Group, Inc. ("DLG"), and Applied Equities, Inc. ("AEI") and certain
10 subsidiaries and affiliates (collectively hereinafter referred to as "Diversified"),
11 pursuant to the Order of Preliminary Injunction and Orders: (1) Continuing Asset
12 Freeze, (2) Appointing a Permanent Receiver, (3) Prohibiting the Destruction of
13 Documents, (4) Granting Expedited Discovery, and (5) Requiring Accountings (the
14 "Preliminary Injunction Order"), signed and entered by this Court on March 10, 2009
15 in the above-captioned case and thereafter amended on March 31, 2009.

16 2. On February 11, 2010, this Court made its Order Re Claims
17 Administration Procedure and Claims Bar Date. A true copy thereof is attached as
18 Exhibit "A" to the Declaration of David A. Gill ("Gill. Decl.") *Inter alia*, it fixed a
19 claims bar date of June 1, 2010, and provided that on or before October 1, 2010, I
20 should file appropriate proceedings to object to claims and/or to establish a
21 procedure for resolution of claims disputes. This pleading is intended to comply
22 with those mandates. A proposed Order is attached to the Declaration of David A.
23 Gill ("Gill. Decl.") as Exhibit "D."

24 3. I gave the requisite notice to creditors and received 1224 claims
25 aggregating \$310,186,780.91. Through direct contact with claimants I eliminated or
26 received amendments to 51 duplicate or otherwise obviously objectionable claims
27 aggregating \$40,051,115.57. I have approximately \$5,000,000 on hand at this time.
28 I have unpaid and accruing administrative expenses. Even without reference to

1 accrued and accruing fees and costs, if all that I have to distribute is the cash now on
2 hand, distributions would be less than one cent on the dollar. This is because Bruce
3 Friedman took in excess of \$50,000,000 of investor moneys for his personal use,
4 many of his investments on behalf of Diversified appear worthless and those
5 remaining are difficult to market, and in view of the general economy, a considerable
6 time will be required to do so.

7 4. For the reasons stated above, at this time there are presently insufficient
8 moneys with which to fund claims litigation and to make distribution beyond
9 fractions of a cent. It may, and hopefully will be that other property of the estate will
10 ultimately be liquidated for a substantial amount and/or there will be significant
11 recoveries on pending litigation. It seems imprudent at this time to expend time and
12 moneys in claims litigation beyond that which is needed to clear away claims which
13 on their face appear to be not allowable. It does seem appropriate as part of this
14 Report to advise creditors of my intentions as to claims and to recommend to the
15 Court for approval a procedure to deal with claims issues as, if and when they
16 become appropriate. Therefore, this Motion seeks, after a hearing, (a) immediate
17 disallowance of duplicative claims, (b) an extension to July 10, 2010 of the last date
18 to file claims and (c) establishment of a procedure for processing of objections to
19 claims. It also seeks to inform claimants as to my position on major anticipated
20 issues, but recommends deferral of resolution of those issues until the anticipated
21 controversies become worthwhile to pursue, so as to minimize possible unnecessary
22 expense and court involvement.

23 **Negotiated Withdrawals of Claims**

24 5. After service of notices pursuant to the court's order we created a docket
25 and reviewed all claims. That docket is available for review on reasonable notice.
26 1186 claims were timely filed aggregating \$305,102,406.70.

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1 6. There were 38 claims filed after the June 1, 2010 claims bar date, the
2 latest of which was received on July 8, 2010 aggregating another \$5,084,374.21.
3 [Exhibit "B" to Declaration of David A. Gill ("Gill Decl.")]

4 7. As to duplicate claims, the review process was relatively clerical; e.g.,
5 after initial claims review, we contacted many claimants and succeeded in obtaining
6 amendments or withdrawals of 51 claims which appeared to be duplicates or were
7 otherwise defective, for a reduction of \$40,051,115.57. Other duplicates are dealt
8 with in this Motion.

9 **Summary of Claims as of Date**

10 8. The profile of timely filed claims (i.e., net of the foregoing withdrawn
11 claims, is as follows:

12	Priority tax claims ¹	2	\$13,751.89
13	Former employees (not for wages)	3	\$1,629,159.64
14	Investors	1,099	\$225,516,218.86
15	Breach of promise to invest ²	6	\$33,356,492.76
16	Vendors	27	\$4,381,724.98
17	Broker	2	\$153,943.00
18	Insurance Companies ³	3	Unliquidated

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24 ¹ There may be additional claims by taxing authorities not affected by the Court's Bar
Order.

25 ² Eight claimants are businesses in which Diversified invested and who allege that
26 Diversified breached agreements to invest additional sums.

27 ³ Two claims were filed by Jackson National Life Insurance Company and one claim was
28 filed by Metropolitan Life Insurance Company, each marked "contingent and unliquidated."

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II.

IMMEDIATE RELIEF REQUESTED

Request to Extend Claims Bar Date

9. 38 claims aggregating \$5,084,374.21 appear to have been be filed after the June 1, 2010 bar date but before July 10, 2010. They are scheduled at Exhibit "B" to the Gill Decl. From their face, some claims were mailed before the Claims Bar Date. All were received in the few weeks after the Bar Date. The latest claim was received on July 8, 2010. While certainly claimants should have complied strictly with the court's order, I would like to accommodate claimants and I believe that the expense of objecting to, defending and adjudicating these claims is not justified, particularly in view of the lack of clarity whether the litigation will be worth the dislocation and expense.

10. I therefore request that the court enter an order extending the last date to file claims to July 10, 2010, so as to protect the claims in Exhibit "B" from objections based on the time of filing;

Objection to and Motion to Disallow Duplicate Claims

11. Based upon the similarity in amounts and supporting documentation submitted with the subject claims, and lack of response to our written inquiries, 58 claims appear to be duplicative. Those claimants who have not voluntarily withdrawn the alleged duplicate claims are scheduled at Exhibit "C" to the Gill Decl. I object to the duplicate claims indicated at Exhibit "C" as "Claims to Disallow," in favor of the claims not so marked.

III.

RECEIVER'S POSITION ON OTHER ISSUES

12. I do not propose that the Court approve the following at this time but believe that inclusion of my position on these matters is appropriately contained in this Motion. I do not and will not assert that claimants have any obligation to respond at this time to matters discussed in this Section III, and will not so argue at a

1 later date. As to the following matters, it seems unwise to litigate the issues
2 described in the following four paragraphs (13-16) at this time, because the estate is
3 not in a position to make significant distributions to claimants and probably will be
4 unable to do so before there are any such recoveries and the impact of such
5 adjustment becomes ascertainable. It seems advisable to avoid contested litigation
6 on these issues at this point. According I propose that resolution of these issues be
7 deferred to a later date when the facts become more clear.

8 Calculation of Claim Amounts

9 13. Formula to calculate allowed claims: I believe that the appropriate and
10 most equitable manner in which to calculate claims amounts from investors is to (a)
11 calculate the amounts of cash invested by each claimant and (b) then to deduct the
12 amounts paid by or on behalf of the Receivership Defendants to the same claimant
13 whether or not the payment were styled as return of principal or interest. I believe
14 that claims for alleged profits would not be valid and allowance unfair to the other
15 claimants, even though Diversified reported to investors that they had earned the
16 same, as there were really no profits at all, payments thereto having been made from
17 funds received from investors in the Ponzi scheme. For the proposed calculation, I
18 would include in receipts, moneys invested in Lenders Depot (a previous Friedman
19 affiliate). I would include as reductions of said claims moneys recovered by
20 investors on their collateral, including annuities held by Jackson National Life
21 Insurance Company and American National Life Insurance Company. At an
22 appropriate time, I will bring this before the Court for determination.

23 14. Moneys paid from third parties to investors: There are actions pending
24 against various defendants on behalf of some claimants in this Receivership who
25 were investors in Diversified. For example, some investors are suing Jackson
26 National Life Insurance on their own claims, and actions are pending in this and
27 other courts against agents and representatives of the Receivership Defendants.
28 These actions, to which I am not a party, may or may not result in recoveries to

1 those claimants. It is premature at this point to know what, if anything, will be
2 recovered by such individuals. It is my position that amounts received by such
3 claimants arising out of the business of the Receivership Defendants from such
4 sources should reduce the amount of the distribution that would ultimately be
5 payable to them on a dollar for dollar basis. If appropriate, I will seek such relief
6 from the Court.

7 Claims variances

8 15. When it is determined that there are moneys with which to pay
9 claimants, it can also be determined the extent to which the amounts claimed exceed
10 the amounts that I believe are due. In my experience, there is almost always a point
11 where it is less costly to allow the claims than to object to them. That point cannot
12 be ascertained at this point prior to substantial completion of the sale of estate assets
13 and resolution of litigation. I will determine that and, if I ask to be given permission
14 to ignore certain variances, will seek instructions from the Court at that time.

15 Priorities of Distribution

16 16. I intend at a later time, if appropriate, to propose to distribute claims
17 pro rata to all unsecured creditors, without regard to whether they are investors,
18 vendors, prior employees or the like; reserving all rights to seek to offset, object on
19 the merits, and the like. As to taxes and other governmental claims I propose to
20 follow state and federal distribution priorities, as applicable. I propose to seek
21 authority for all of this at a later time.

22 23 IV.

24 MANNER OF LITIGATING CLAIMS OBJECTIONS

25 17. For the reasons stated herein, I believe, recommend and request that I
26 be excused from immediately objecting to claims. Should it become necessary to
27 litigate specific claims matters, I propose that objections be filed in the form of
28 motions and subject to the procedure governing motions, including the right of the

1 Court to authorize oral testimony if appropriate. I also request that I be authorized to
2 enter into agreements for voluntary mediation under General Orders 04-01 and 07-01
3 and the alternative of binding arbitration if the parties so stipulate, decisions of the
4 arbitrator being subject to confirmation by this Court pursuant to the Federal
5 Arbitration Act.

6 **V.**

7 **MANNER OF NOTICE HEREOF**

8 18. This Motion is being served on all parties in interest in the manner set
9 forth in this court's Order re Claims Administration Procedure and Claims Bar dated
10 February 11, 2010, including posting on the case website and, additionally, by first
11 class mail postage prepaid on the persons whose duplicate claims are objected to
12 herein, addressed to the address or addresses set forth in the claims objected to.

13
14 WHEREFORE I pray as follows:

15 1. that the last date to file claims be extended retroactively from June 1,
16 2010 to July 31, 2010;

17 2. that the claims identified on Exhibit "C" to my declaration filed
18 herewith as being duplicates be disallowed in favor of the claim not so marked,
19 reserving my right to object at a later time to such claims on the merits;

20 3. that the Court permit me to defer prosecution of other objections to
21 claims at this time, pending further order of this court, subject to my obligation to
22 report on the status of the case and the status of claims objections semi-annually as
23 part of my required Receiver's reports and accounts;

24 4. that the procedures for processing objections contained herein and set
25 forth in the Proposed Order filed herewith be approved;

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1 5. that the Court approve the manner of notice hereof as set forth in
2 Paragraph 18; and

3 6. for all other proper relief.

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5 Given at Los Angeles, California, on October 1, 2010.

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David A. Gill, Receiver

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1 those remaining will be difficult to market, and in view of the general economy, a
2 considerable time will be required to do so.

3 5. For the reasons stated above, at this time, there are insufficient moneys
4 with which to fund claims litigation and to make distribution beyond fractions of a
5 cent. It may, and hopefully will be that other property of the estate will ultimately be
6 liquidated for a substantial amount and/or there will be significant recoveries on
7 pending litigation. It seems imprudent at this time to expend time and moneys in
8 claims litigation beyond that which is needed to clear away claims which on their
9 face appear to be not allowable. It does seem appropriate as part of this Report to
10 advise creditors of my intentions as to claims and to recommend to the Court for
11 approval a procedure to deal with claims issues as, if and when they become
12 appropriate.

13 6. After service of notices pursuant to the court's order we created a docket
14 and reviewed all claims. That docket is available for review on reasonable notice.
15 1186 claims were timely filed aggregating \$305,102,406.70.

16 7. 38 claims aggregating \$5,084,374.21 appear to have been be filed after
17 the June 1 bar date but before July 10, 2010. They are scheduled at Exhibit "B"
18 hereto. From their face, some claims were mailed before the Claims Bar Date. All
19 were received in the few weeks after the Bar Date. The latest claim was received on
20 July 8, 2010. While certainly claimants should have complied strictly with the
21 court's order, I believe that the expense of objecting to, defending and adjudicating
22 these claims is not justified, particularly in view of the lack of clarity whether the
23 litigation will be worth the dislocation and expense. Reserving my rights to object
24 on the merits, I see no real harm to anyone in allowance of these late filed claims.

25 8. The profile of timely filed claims (i.e., net of the foregoing withdrawn
26 claims, is as follows:

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1	Priority tax claims ⁴	2	\$13,751.89
2	Former employees (not for wages)	3	\$1,629,159.64
3			
4	Investors	1,099	\$225,516,218.86
5	Breach of promise to invest ⁵	6	\$33,356,492.76
6	Vendors	27	\$4,381,724.98
7			
8	Broker	2	\$153,943.00
9	Insurance Companies ⁶	3	Unliquidated

11 9. Based upon the similarity in amounts and supporting documentation
12 submitted with the subject claims, and lack of response to our written inquiries,
13 approximately 58 claims appear to be duplicative. Those claimants who have not
14 voluntarily withdrawn the alleged duplicate claims are scheduled at Exhibit "C"
15 hereto. I object to the duplicate claims indicated at Exhibit "C," and ask that all
16 claims scheduled at that Exhibit as "Claims to Disallow" be disallowed in favor of
17 the claims not so designated.

18 10. I believe that the appropriate and most equitable manner in which to
19 calculate claims amounts from investors is to (a) calculate the amounts of cash
20 invested by each claimant and (b) then to deduct the amounts paid to or on behalf of
21 the Receivership Defendants to said investors whether or not the payment were
22

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24 ⁴ There may be additional claims by taxing authorities not affected by the Court's Bar Order.

25 ⁵ Eight claimants are businesses in which Diversified invested and who allege that
26 Diversified breached agreements to invest additional sums.

27 ⁶ Two claims were filed by Jackson National Life Insurance Company and one claim was
28 filed by Metropolitan Life Insurance Company, each marked "contingent and unliquidated."

1 styled as return of principal or interest. I believe that claims for alleged profits
2 would not be valid, as there were really no profits at all, payments thereto having
3 been made from funds received from investors in the Ponzi scheme. For the
4 proposed calculation, I would include in receipts, moneys invested in Lenders Depot
5 (a previous Friedman affiliate). I would include as reductions of said claim moneys
6 recovered by investors on their collateral, including annuities held by Jackson
7 National Life Insurance Company and American National Life Insurance Company.
8 Prior to distribution to claimants I will bring this before the Court for determination.

9 11. There are actions pending against various defendants on behalf of some
10 claimants in this Receivership who were investors in Diversified. For example, some
11 investors are suing Jackson National Life Insurance on their own claims, and actions
12 are pending in this and other courts against agents and representatives of the
13 Receivership Defendants. These actions, to which I am not a party, may or may not
14 result in recoveries to those claimants. It is premature at this point to know what, if
15 anything, will be recovered by such individuals. It is my position that amounts
16 received by such claimants arising out of the business of the Receivership
17 Defendants from such sources should reduce the amount of the distribution that
18 would ultimately be payable to them on a dollar for dollar basis. But I do not know
19 if this concern has practical implications or is merely academic.

20 12. It seems to me unwise to litigate these and other issues on the merits at
21 this time, because the estate is not in a position to make significant distributions to
22 claimants and probably will be unable to do so before there are any such recoveries
23 and the impact of such adjustment becomes ascertainable. It seems advisable to
24 avoid contested litigation on these issues at this point. Accordingly I propose that
25 these issues be deferred to a later date when the facts become more clear.

26 13. When it is determined that there are moneys with which to pay
27 claimants, it can also be determined the extent to which the amounts claimed exceed
28 the amounts that I believe are due. In my experience, there is almost always a point

1 where it is less costly to allow the claims than to object to them. That point cannot
2 be ascertained at this point prior to substantial completion of the sale of estate assets
3 and resolution of litigation I will determine that and, if I ask to be given permission
4 to ignore certain claim amount variances, I will seek instructions from the Court at
5 that time.

6 14. I intend at a later time, if appropriate, to propose to distribute claims
7 pro rata to all unsecured creditors, without regard to whether they are investors,
8 vendors, prior employees or the like; reserving all rights to seek to offset, object on
9 the merits, and the like. As to taxes and other governmental claims I propose to
10 follow state and federal distribution priorities, as applicable. I propose to seek
11 authority for all of this at a later time.

12 15. It is conceivable that we may need to litigate certain claims at some
13 point before that which I now anticipate. I propose that objections to claims be
14 litigated by motion, subject to any orders that the court might determine to make
15 relative to oral testimony. I also recommend that I be authorized to enter into
16 agreements for voluntary mediation under General Orders 04-01 and 07-01 and an
17 alternative of binding arbitration if the parties so stipulate, awards to be subject to
18 confirmation by this Court pursuant to the Federal Arbitration Act.

19
20 I declare under penalties of perjury under the laws of the United States of America
21 that the foregoing is true and correct.

22
23 Given at Los Angeles, California on October 1 2010

24
25 
26 _____
27 David A. Gill, Receiver
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EXHIBIT "A"

1 DAVID A. GILL (State Bar No. 032145)
dag@dgdk.com
2 DANNING, GILL, DIAMOND & KOLLITZ, LLP
2029 Century Park East, Third Floor
3 Los Angeles, California 90067-2904
Telephone: (310) 277-0077
4 Facsimile: (310) 277-5735

5 Receiver

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

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SECURITIES AND EXCHANGE
COMMISSION,

Case No. CV 09-01533-R-SS

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Plaintiff,

**ORDER RE CLAIMS
ADMINISTRATION PROCEDURE
AND CLAIMS BAR DATE**

13

vs.

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DIVERSIFIED LENDING GROUP,
INC.; APPLIED EQUITIES, INC.; AND
16 BRUCE FRIEDMAN,

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Defendants,

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and

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TINA M. PLACOURAKIS,

[No hearing requested]

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Relief Defendant.

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There came before this Court the *Ex Parte Application for Order to Establish
Claims Administration Procedure and to Set Claims Bar Date; Declarations of
David A. Gill and Kathy Bazoian Phelps* (the "Ex Parte Application"), filed by David
A. Gill, the Receiver (the "Receiver") in the above-captioned case. There were no
objections thereto, and the matter was taken under submission. The Ex Parte

1 Application and the Supplemental Declaration of David A. Gill having been
2 considered by the Court and, good cause appearing,

3 IT IS HEREBY ORDERED:

4 1. The Receiver is authorized to retain Omni Management Group, LLC, as the
5 authorized Claim Agent, with the duties and on the terms set forth in the Ex Parte
6 Application.


7 2. All claims against the receivership estate shall be filed in writing with Omni
8 Management Group, LLC, substantially in the form of the exemplar Claim Form
9 attached as Exhibit 2 to the Declaration of David A. Gill filed with and in support of
10 the Ex Parte Application.

11 3. The last day for claimants to file a claim against the receivership estate (the
12 "Claims Bar Date") is fixed as June 1, 2010; any claims filed after that date are
13 barred from participating in any distribution of assets from the receivership estate.

14 4. The form and substance of the Notice of Claims Bar Date and Procedure for
15 Filing Claims provided by the Receiver is appropriate. It shall be served by U.S.
16 Mail, first class postage prepaid, within ten days after the date of this Order, on each
17 creditor known to the Receiver, at the most recent addresses contained in his records.

18 5. On or before October 1, 2010 the Receiver shall file appropriate proceedings
19 in this court to object to claims and/or to establish a procedure for resolution of
20 claims disputes.

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22
23 Dated: February 11, 2010



MANUEL L. REAL
United States District Judge

EXHIBIT "B"

Receivership of Diversified Lending Group, Inc.
 Claims Filed After June 1, 2010

Late Filed Claim No.	Claim No.	Creditor	Primary Address	Claim Amount	Date Received
1	1201	Blake, Donna F	25821 Lois Lane Dr. Southfield, MI 48075	\$ 49,030.00	06/03/10
2	1204	Caveman Productions, Inc.	C/O RSA, Inc 232 Maddison Avenue New York, NY 10016 LSHR CPA'S LLC Lebenhart, Seckendorf, Hasson, & Reilly CPA'S, LLC 3000 Marcus Ave, Suite 3W7 Lake Success, NY 11042	\$ 10,000.00	06/04/10
3	1207	Custer, Denise T	707 S. Vine Street Hinsdale, IL 60521	\$ 451,619.00	06/07/10
4	1209	Dilger, Michael Andrew	2435 Avenida De Las Plantas Thousand Oaks, CA 91360	\$ 75,466.58	06/07/10
5	1223	Gupta, Samuel Gupta, Janet	2736 Armour Lane Redondo Beach, CA 90278	\$ 116,052.85	06/16/10
6	1205	Hoffman, Michael	4193 W Ivanhoe Court Chandler, AZ 85226	\$ 100,000.00	06/04/10
7	1189	Ingenix, Inc.	C/O Mitchell W. Granberg, Esq. 12125 Technology Drive Eden Prairie, MN 55344	\$ 234,200.00	06/02/10
8	1220	Keller, Nadya C - Deceased	285 Twin Lakes Road Natchitoches, LA 71457 Kevin Keller / Karen Searight co-executors 2300 Mirow Place Charlotte, NC 28270	\$ 102,910.92	06/24/10
9	1194	Lamoreaux Trust dated June 12, 2007	Karen Lamoreaux 25113 Doria Ave. Lomita, CA 90717	\$ 50,000.00	06/02/10
10	1195	Lamoreaux Trust dated June 12, 2007	Karen Lamoreaux 25113 Doria Ave. Lomita, CA 90717	\$ 180,800.00	06/02/10
11	1197	Lamoreaux Trust dated June 12, 2007	Karen Lamoreaux 25113 Doria Ave. Lomita, CA 90717	\$ 100,000.00	06/02/10
12	1198	Lamoreaux, Karen Sue	25113 Doria Ave. Lomita, CA 90717	\$ 418,626.89	06/02/10
13	1199	Lamoreaux, Karen Sue	25113 Doria Ave. Lomita, CA 90717	\$ 160,000.00	06/02/10

