

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

Civil Action No. 4:11-CV-00655

JAMES G. TEMME,
STEWARDSHIP FUNDS, LP

Defendants.

**UNOPPOSED MOTION FOR EXTENTION OF TIME FOR THE FINCH & BARRY
GROUP TO FILE OBJECTIONS TO U.S. MAGISTRATE JUDGE'S REPORT AND
RECOMMENDATION ON THE MOTION TO APPROVE SETTLEMENT AGREEMENT
WITH THE HSP/HARBOUR PARTIES**

MDA Realty Holdings, LLC, MVB Realty Holdings, LLC, LF Realty Holdings, LLC, 48th Street Holdings LLC, and F & B Note Holding, LLC (collectively, the "F & B Group") file this Unopposed Motion for Extension of Time to file Objections to the United States Magistrate Judge's Report and Recommendation on the Motion to Approve Settlement Agreement with the HSP/Harbour Parties [Doc. 307] (the "Recommendation") as follows:

1. The Honorable United States Magistrate Judge Amos L. Mazzant filed his Recommendation on January 8, 2014. Per the Recommendation, and the F&B Group's deadline to file objections is currently January 22, 2014. This unopposed motion seeks a seven (7) day extension of this response deadline to and including January 29, 2014.

2. Counsel for the F&B Group have been in discussions with the Receiver, and his counsel, regarding the proposed HSP/Harbour Parties settlement, and are very close to reaching terms of a settlement. The settlement being discussed would obviate the need for the filing of objections to the Magistrate's Recommendation and would

serve the interests of conserving judicial resources, private resources, and the resources of the estate of this brief extension is granted. The F&B Group is the only party who originally filed objections to the Receiver's proposed settlement with these parties. Unfortunately, the Receiver is traveling on the East Coast today and tonight, and due to the extreme weather conditions there, is difficult to reach to allow the parties to work through the final terms of the parties' settlement.

3. The Finch & Barry Group therefore seek an extension of seven days in order to continue these negotiations and to seek to finalize a settlement.

4. Therefore, the F&B Group respectfully request an extension to prepare and file objections to the Recommendation, if necessary, to and including January 29, 2013.

5. Counsel for the F&B Group has conferred with counsel for the Receiver, who has stated that he is in agreement with this request for a 7 day extension for the purposes set forth herein.

BASED ON THE FOREGOING, the F& B Group respectfully requests that the Court grant this Unopposed Motion for Extension of Time of seven days to File Objections to the United States Magistrate Judge's Report and Recommendation on the Motion to Approve Settlement Agreement with the HSP/Harbour Parties, and for such other and further relief to which they may be justly entitled.

Date: January 22, 2014

Respectfully submitted,

PENNINGTON HILL, LLP.

By: /s/ H. Allen Pennington, Jr.
H. Allen Pennington, Jr.
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ATTORNEYS FOR MDA REALTY HOLDINGS,
LLC, MVB REALTY HOLDINGS, LLC, LF
REALTY HOLDINGS, LLC 48TH STREET
HOLDINGS LLC, AND F & B NOTE HOLDING,
LLC

CERTIFICATE OF CONFERENCE

Pursuant to the rules, on January 22, 2014, I conferred with counsel for the Receiver, who stated he is not opposed to and agrees with the relief sought in this motion.

/s/ H. Allen Pennington, Jr.
H. Allen Pennington, Jr.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via the Court's ECF system on this the 22nd day of January, 2014.

/s/ H. Allen Pennington, Jr.
H. Allen Pennington, Jr.