

Keith M. Aurzada
Texas Bar No. 24009880
2200 Ross Avenue, Suite 3300
Dallas, TX 75201
(214) 721-8000 (Telephone)

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

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

JAMES G. TEMME, and STEWARDSHIP
FUND, LP

Defendant.

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CIVIL ACTION NO.: 4:11-cv-655

NOTICE OF SUBPOENA

PLEASE TAKE NOTICE that, pursuant to Rule 45 of the Federal Rules of Civil Procedure, Securities Exchange Commission, intends to serve a subpoena on Paladin Solutions, LLC, in the form attached hereto as **Exhibit 1**, respectively, and incorporated herein by reference, on April 11, 2012 or as soon thereafter as service may be effectuated.

Respectfully submitted,

/s/Keith M. Aurzada
Keith M. Aurzada
Texas Bar No. 24009880
2200 Ross Avenue, Suite 3300
Dallas, Texas 75201
(214) 721-8000 (Telephone)

Certificate of Service

I hereby certify that on April 11, 2012, a true and correct copy of the foregoing Notice of Subpoenas was served via electronic mail on the parties subscribing to the Court's CM/ECF service in this case.

/s/ Keith M. Aurzada

Keith M. Aurzada

EXHIBIT

1

I. Issued by the

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

SUBPOENA IN A CIVIL CASE

v.

CASE NO.: 4:11-cv-655

JAMES G. TEMME, and STEWARDSHIP
FUND, LP

Eastern District of Texas

Defendant.

TO: Paladin Solutions, LLC
c/o Richard Goldman
1901 Avenue of the Stars, Suite 1925
Los Angeles, CA 90067

YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

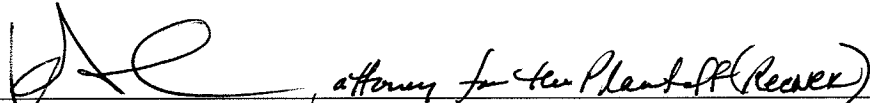
PLACE OF DEPOSITION	DATE AND TIME
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date and time specified below (list documents or objects): **See Exhibit A.**

PLACE	DATE AND TIME
Bryan Cave, LLP c/o Keith M. Aurzada 2200 Ross Avenue, Suite 3300 Dallas, TX 75201	May 1, 2012 9:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
 attorney for the Plaintiff (Receiver)	April 11, 2012

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Keith Aurzada, Bryan Cave LLP, 2200 Ross Avenue, Suite 3300, Dallas, TX 75201 Ph: 214.721.8000

PROOF OF SERVICE

DATE SERVED April 11, 2012		PLACE Paladin Solutions, LLC c/o Richard Goldman 1901 Avenue of the Stars, Suite 1925 Los Angeles, CA 90067	
SERVED ON (PRINT NAME)		MANNER OF SERVICE Hand delivery	
SERVED BY (PRINT NAME)		TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in

person, except that, subject to the provisions of clause (3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT A

INSTRUCTIONS

If any document or item of property described herein was, but no longer is, within your possession, custody or control, or if you have knowledge of a specific document or item of property that is clearly responsive to a request but such document or item is not within your possession, custody or control, please state in detail:

- (a) a summary of the contents of the document;
- (b) what disposition was made of it;
- (c) the date of such disposition;
- (d) whether the original or a copy thereof is in the possession, custody, or control of any other person, corporation or entity; and
- (e) if the answer to (d) is in the affirmative, the identity of that other person, corporation or entity.

All definitions set forth below apply to the foregoing instructions as well as to the requests themselves, and shall be carefully regarded.

DEFINITIONS

As used herein:

1. “Any” or “each” should be understood to include and encompass “all;” the term “or” should be understood to include and encompass “and;” and the term “and” should be understood to include and encompass “or.”

2. The term “document(s)” shall be used in its broadest sense and is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, any tangible thing upon which any

expression, communication, data or representation has been recorded by any means including, but not limited to, handwriting, typewriting, printing, photostating, electronic mail (e-mail), on a computer, photographing, magnetic impulse, or mechanical or electronic recording and any non-identical copies (whether different from the original because of notes made on such copies, because of indications that said copies were sent to different individuals than were the originals, or because of any other reason), including but not limited to working papers, preliminary, intermediate or final drafts, correspondence, memoranda, charts, notes, records of any sort of meetings, invoices, financial statements, financial calculations, diaries, reports of telephone or other oral conversations, desk calendars, appointment books, audio or video tape recordings, microfilm, microfiche, computer tape, computer disk, computer printout, computer card, and all other writings and recordings of every kind that are in your actual or constructive possession, custody, or control. A draft or non-identical copy is a separate document within the meaning of this term.

3. "Related to" means consisting of, referring to, reflecting, relating to, pertaining to, or in any way logically or factually connected with the matter discussed. A document that "concerns" a given subject is any document identifying, showing, referring to, dealing with, evidencing, commenting upon, having as a subject, describing, summarizing, analyzing, explaining, detailing, outlining, defining, interpreting, or pertaining to that subject, including, without limitation, documents referring to the presentation of other documents.

4. "Communication(s)" means the transmittal of information in the form of facts, ideas, inquiries, or otherwise, whether oral, telephonic, telegraphic, electronic, written, printed, recorded, graphic, photographic, or otherwise.

5. The use of the singular form of any word shall include the plural and vice versa.

6. The masculine form of a pronoun is defined to include the feminine and vice versa.

REQUESTED DOCUMENTS

1. Any and all documents evidencing transactions or purchases of notes or real property by and between Paladin Solutions, LLC and Stewardship Fund, LP, James G. Temme, or Doug Furra from January 2007 to the present.
2. Any and all documents evidencing transactions or purchases of notes or real property by and between Paladin Fund I, LLC and Stewardship Fund, LP, James G. Temme or Doug Furra from January 2007 to the present.