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COUNSEL FOR THE RECEIVER

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

IN RE: § **Case No. 11-35165-7**
§
RETIREMENT VALUE, LLC, § **Involuntary Chapter 7**
§
DEBTOR. §

MOTION FOR EXPEDITED HEARING

Eduardo S. Espinosa, in his capacity as the State Court Receiver (the “Receiver”) for Retirement Value, LLC (the “Alleged Debtor”) appointed by the District Court of Travis County, Texas for the 126th Judicial District files this Motion for Expedited Hearing (the “Expedited Motion”) on Receiver’s Motion for Interim and Final Relief Pursuant to 11 U.S.C. § 543(d) From Turnover of Property, or, Alternatively, for Abstention Pursuant to 11 U.S.C. § 305(a) (the “Underlying Motion”). In support of the Expedited Motion, the Receiver states the following:¹

1. In the Underlying Motion, the Receiver seeks an Order excusing him of his obligations under Section 543 of the Bankruptcy Code, including turnover of the Alleged Debtor’s estate.

¹ By filing this Expedited Motion, the Receiver does not consent to venue in the Northern District of Texas. The Receiver hereby reserves his right to contest the proper venue of these proceedings.

2. The Court has already set an expedited hearing on August 22, 2010, at 10:30 a.m. on the Motion of the Petitioning Creditors to appoint an interim trustee (the "Trustee Motion"). The relief requested in the Underlying Motion is related to and, in many respects, intertwined with the relief sought in the Trustee Motion.

3. The Receiver hereby requests an expedited hearing on **Monday, August 22, 2011, at 10:30 a.m.** so that both the Underlying Motion and the Trustee Motion can be heard together. The Petitioning Creditors, the U.S. Trustee, representatives of the Texas Attorney General's office, the Receiver, and other parties-in-interest will already be present at the courthouse on this date, thus adding very little additional burden on the parties.

4. Notice of the Underlying Motion has or will be given to the Office of the United States Trustee, the Petitioning Creditors, and all parties that have requested notice in this case.

WHEREFORE, the Receiver respectfully requests this Court: (i) grant this Expedited Motion; (ii) set a response and objection deadline by August 22, 2011 at 10:30 a.m.; (iii) set an expedited hearing on August 22, 2011 at 10:30 a.m. to consider the Underlying Motion; and (iv) grant the Receiver any such other and further relief to which it may be justly entitled.

[Intentionally left blank]

DATE: August 19, 2011

Respectfully submitted,

By: /s/ Artoush Varshosaz
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CERTIFICATE OF SERVICE

I certify that on August 19, 2011, a true and correct copy of the attached Expedited Motion was served via email through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service and via first class U.S. Mail upon the parties listed below.

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