

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	1:13-cv-1817-WSD
v.)	
)	
DETROIT MEMORIAL PARTNERS, LLC,)	
and MARK MORROW,)	
)	
Defendants.)	

**RECEIVER’S RESPONSE TO PETITION BY ST. AUGUSTINE’S FOR
ASSET OFFER TO PURCHASE 28 MICHIGAN CEMETERIES**

Jason S. Alloy, the Court-appointed Receiver for Defendant Detroit Memorial Partners, LLC (“DMP”), files this response to the Petition by Cathedral of St. Augustine’s (“CSA”) for Asset Offer to Purchase 28 Michigan Cemeteries. (Doc. 223.)

This is CSA’s second motion before this Court. Through the first motion filed two years ago, CSA had proposed to purchase the assets of Midwest Memorial Group, LLC (“MMG”), which principally consisted of 28 cemeteries in Michigan. (See Doc. 142.) The Receiver opposed the motion. (See Doc. 146.) On May 10, 2016, this Court entered an Order by docket entry holding that Park Lawn Corporation (“Park Lawn”) had purchased DMP’s 49% interest in MMG,

that DMP no longer had an interest in MMG, and the Court denied CSA's petition as moot.

Despite CSA being represented by the same counsel as two years ago and having notice of the sale of DMP's interest in MMG, CSA's newest Petition seeks approval to purchase the 28 Michigan cemeteries. As CSA is aware, however, DMP never directly owned any cemeteries. Instead, DMP held a 49% interest in MMG, which in turn owned the cemeteries. (*See* Doc. 146 at 11-12.) In March 2016 DMP sold its 49% interest in MMG to Park Lawn, and since that sale, DMP has not even had an indirect interest in any cemeteries. All of this is set forth in the Receiver's filings, which CSA's counsel would have received as counsel of record in the case (since CSA's earlier filing) or by checking the docket in this receivership.

CSA's Petition is frivolous, and it is moot for the same reasons as the prior filing. Accordingly, DMP respectfully requests that this Petition be denied.

Submitted this 26th day of June, 2018.

/s/ Jason S. Alloy
Jason S. Alloy
Georgia Bar No. 013188
Robbins Ross Alloy Belinfante
Littlefield LLC
999 Peachtree Street, N.E., Suite 1120
Atlanta, Georgia 30309

Telephone: 678-701-9381

*Court-Appointed Receiver for Detroit
Memorial Partners, LLC*

LOCAL RULE 7.1D CERTIFICATION

I hereby certify that the foregoing **RECEIVER'S RESPONSE TO PETITION BY ST. AUGUSTINE'S FOR ASSET OFFER TO PURCHASE 28 MICHIGAN CEMETERIES** was prepared in Times New Roman 14 point, which is one of the font and point selections approved by the Court under Local Rule 5.1B.

This 26th day of June, 2018.

/s/ Jason S. Alloy _____
Jason S. Alloy

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing **RECEIVER'S RESPONSE TO PETITION BY ST. AUGUSTINE'S FOR ASSET OFFER TO PURCHASE 28 MICHIGAN CEMETERIES** with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

I have also served the foregoing by email and U.S. Mail on Defendant Mark Morrow at the following addresses.

Mark Morrow
8643 Twilight Tier
Cincinnati, Ohio 45249
mmorr7887@aol.com

This 26th day of June, 2018.

/s/ Jason S. Alloy

Jason S. Alloy