

NORTHERN DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

CIVIL ACTION FILE NO.
1:13-CV-01817-WSD

v.

DETROIT MEMORIAL PARTNERS, LLC,
and MARK MORROW,

Defendants.

PETITION BY CATHEDRAL OF ST. AUGUSTINE’S FOR ASSET
OFFER TO PURCHASE 28 MICHIGAN CEMETERIES

Cathedral of St. Augustine’s, a Michigan ecclesiastical corporation, (“St. Augustine’s”, herein), by Counsel Michael E. Norman, and Co-Counsels for its Offer To Purchase 28 Michigan Cemeteries as follows.

St. Augustine’s wishes to inform the Court of its Offer To Purchase is Twenty One Million Five Hundred Thousand Dollars & no/100 (\$21,500,000) USD; Cash.

Distribution of proceeds allocated from sale to Cathedral of St. Augustine's is proposed as follows.

1. Seventeen Million Five Hundred Thousand & no/100 Dollars
(\$17,500,000) Cash USD including Non-Buyer, Non-Seller Closing Fees and Expenses.
2. Three Million Dollars & no/100 (\$3,000,000) Trust for the construction, restoration, historical preservation and improvement to the 28 MI Cemeteries.
3. One Million Dollars & no/100 (\$1,000,000) Reserve Fund to mitigate resolve of Credit Claims, amortized.
4. A Closing of may be scheduled to consummate Cathedral St. Augustine's Offer To Purchase the "28 Michigan Cemeteries", forthwith, upon Order of this Honorable Court.

5. Should this Honorable Court consider St. Augustine's Offer To Purchase, all such information and notices, including request for "Proof of Funds" may be sent to Michael E. Norman Esq., and Co-Counsels at the electronic filing address of Michael Norman registered with the Court.

WHEREFORE, Petitioner, St. Augustine's requests the Court to grant it the privilege to consummate its Offer To Purchase 28 Michigan Cemeteries forthwith, as requested throughout this Motion, and supplemental supporting brief.

Dated: June 25, 2018

Respectfully submitted

/s/ Michael E. Norman

Michael E. Norman
GA BAR No. 545993
Counsel for Cathedral of St. Augustine's