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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
FILED

November 28, 2011

Hon. Nancy F. Atlas, USDJ
United States District Court
515 Rusk Avenue
Houston, TX 77002

NOV 30 2011

David J. Bradley, Clerk of Court

Re: Taylor v. Frishberg, et al.
09 cv 3674 (NFA)

Dear Judge Atlas:

I am enclosing a motion for admission *pro hac vice* to represent Daniel Frishberg and Elisea T. Frishberg in the action commenced by the Receiver, Thomas Taylor III.

I am writing to request a thirty day extension of my time to respond to the Amended Complaint filed by the Receiver on November 17, 2011 (Docket Entry 150).

I was retained by Daniel and Elisea Frishberg last Wednesday. I contacted Mr. Taylor today to request his consent to this extension, and he stated that he would not consent, just because the Frishbergs had changed attorneys, because he had already granted several extensions to Peter Stanton.

While I understand that Daniel and Elisea Frishberg authorized Mr. Stanton to accept service of the summons and complaint on their behalf, he did not and could not have appeared on their behalf, since he is representing co-defendants Barrington Financial Advisers, Inc. and William Heath, defendants with differing interests in this litigation from the Frishbergs.

The Amended Complaint in this action runs to forty-four pages and one-hundred sixty-three paragraphs. After several readings, and a number of hours on the telephone with my clients, I am only beginning to understand the factual and legal issues necessary to adequately frame a response.

I am therefore requesting that this Court grant my application for admission *pro hac vice*, and grant an extension until December 30, 2011 for the responses of Daniel and Elisea Frishberg to the Amended Complaint.

Respectfully submitted,

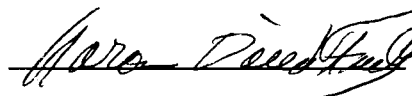

Aaron David Frishberg

cc: via e-mail and mail, w/ encs.
Thomas Taylor, III, Esq.
Peter James Stanton, Esq.

Declaration of Service

Aaron David Frishberg declares under penalties of perjury pursuant to federal law that on November 28, 2011, I served true copies of the within letter to the Court and Motion for admission pro hac vice upon Thomas Taylor III, Esq. and Peter Stanton, Esq. by e-mail and mail.

Executed on November 28, 2011.

A handwritten signature in black ink, appearing to read "Aaron David Frishberg", written in a cursive style.

Aaron David Frishberg