

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
v.	§	Civil Action No. 4:09-cv-3674
	§	
ALBERT FASE KALETA and	§	
KALETA CAPITAL MANAGEMENT, INC.,	§	
	§	
Defendants,	§	
	§	
BUSINESSRADIO NETWORK, L.P. d/b/a	§	
BizRadio and DANIEL FRISHBERG	§	
FINANCIAL SERVICES, INC., d/b/a	§	
DFFS CAPITAL MANAGEMENT, INC.,	§	
	§	
Relief Defendants,	§	
Solely for the Purposes	§	
of Equitable Relief.	§	

**RECEIVER’S UNOPPOSED MOTION FOR EXTENSION
OF DEADLINE TO ADD NEW PARTIES**

COMES NOW, Thomas L. Taylor, III (“Receiver”), Court-appointed Receiver in the above styled action, and moves the Court for an extension of the current deadline to add new parties, and would respectfully show the Court as follows:

The current deadline to add new parties to this action as set by the Court is August 10, 2011. The Receiver is prepared to file litigation against certain potential parties on or before this current deadline, and foresees doing so in certain instances, irrespective of whether the extension requested in this Motion is granted.

However, the Receiver is also currently engaged in settlement negotiations with several potential parties to this action. In the event that those settlement negotiations are successfully completed prior to the current deadline, Receiver anticipates filing motions for Court approval of

any settlement negotiated. In the event such approval is not granted, such a ruling by the Court in all likelihood would not be issued until after the current deadline. Furthermore, some settlement negotiations may require a longer timeframe than the current deadline permits.

Receiver therefore requests an extension of forty-four (44) days to the current deadline to add new parties to this action, making the new deadline Friday, September 23, 2011. Such an extension would facilitate both the negotiation of settlements by the Receiver and any approval thereof by the Court. Receiver has spoken with counsel for the SEC, the only remaining party to the main action, who does not oppose this motion.

July 21, 2011

Respectfully submitted,

By: /s/ Thomas L. Taylor, III
Thomas L. Taylor III
Texas State Bar: 19733700

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COURT-APPOINTED RECEIVER FOR KALETA
CAPITAL MANAGEMENT, INC., ET AL.

CERTIFICATE OF SERVICE

On July 21, 2011, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Southern District of Texas, using the electronic case filing system. I hereby certify that I have provided copies to all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/
Thomas L. Taylor III