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September 29, 2012

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

Taylor v. Frishberg, et al.
CA no.4:12-cv-01491

Dear Judge Atlas:

At the time of the preliminary conference, I had stated that Daniel and Elisea Frishberg were not anticipating adding additional parties. After consultation with my clients, I now expect to file a third-party complaint naming David Wallace and Wallace-Bejalli Limited Partners as defendants.

Additionally, although it would appear that the Receiver in his official capacity has quasi-judicial immunity from suit, I anticipate seeking to have the Receiver designated as having taken actions which caused losses to the relief defendants and their investors which the suit attributes to the Frishbergs.

Respectfully submitted,

Aaron David Frisberg
Attorney for Defendants
Daniel and Elisea Frishberg

cc: Gene Besen
Peter Stanton
via mail and ECF