

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

<p>SECURITIES AND EXCHANGE COMMISSION,</p> <p>Plaintiff, vs.</p> <p>TRAVIS E. CORRELL, individually and doing business as Horizon Establishment; et al.</p> <p>Defendants, and</p> <p>BANNER SHIELD, LLC; et al.</p> <p>Defendants Solely for Purposes of Equitable Relief.</p> <hr/>	<p style="text-align: center;">Lead Case</p> <p style="text-align: center;">Case No.: 4:05-CV-472 RAS</p> <p style="text-align: center;">Consolidated Case</p> <p style="text-align: center;">Case No.:4:07-cv-346 RAS</p>
<p>SECURITIES AND EXCHANGE COMMISSION,</p> <p>Plaintiff, vs.</p> <p>GLOBAL FINANCE & INVESTMENTS, INC.; et al.</p> <p>Defendants, and</p> <p>USASSET & FUNDING CORP.; et al.</p> <p>Defendants Solely for Purposes of Equitable Relief.</p>	<p style="text-align: center;">RECEIVER'S MOTION TO APPROVE THE PLAN FOR CLAIMS ADMINISTRATION AND DISTRIBUTION OF PROCEEDS</p> <p style="text-align: center;">(IN CONSOLIDATED CASE GLOBAL FINANCE)</p>

S. Gregory Hays, Receiver for Defendants Global Finance & Investments, Inc.; Charles R. Davis; Lucre Fund, LLC; JTA Enterprises, Inc.; William Clark; Sterling Meridian, LLC; and, Relief Defendant Wells Ventures, LLC, (collectively, the "Receiver Defendants"), files this Motion for the Court to Approve The Plan for Claims Administration and the Distribution of Proceeds. The proposed Plan for Claims Administration and the Distribution of Proceeds is attached hereto as Exhibit "A." Notice of the Receiver's Motion is attached hereto as Exhibit "B."

In support of this motion, the Receiver relies on his supporting brief and the Plan for Claims Administration and the Distribution of Proceeds, filed contemporaneously herewith.

WHEREFORE, S. Gregory Hays, Receiver, respectfully requests that the Court grant his Motion for Approval of the Receiver's Plan for the Distribution of Proceeds.

This 14th day of November, 2008.

TROUTMAN SANDERS LLP

/s/ Merle R. Arnold III
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Attorneys for S. Gregory Hays,
Receiver

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i) of the United States District Court for the Eastern District of Texas, the Receiver has, prior to filing this Motion, consulted with counsel for all remaining parties to this action in a good faith attempt to resolve the matter without court intervention and no opposition was voiced.

Furthermore, in accordance with his practice in the above-styled case, the Receiver is providing Notice of the Motion to all known investors and creditors of the Receiver Estate and posting the Motion on his website so that any and all investors and/or creditors will have an opportunity to review it and file objections. Accordingly, and out of an abundance of caution, the Receiver states for purposes of this certificate that **this Motion is opposed at this time**. If no investor objects to this Motion after fifteen (15) days from the date of the filing, the Receiver will notify the Court that it is unopposed.

/s/ Merle R. Arnold III
Merle R. Arnold III
Texas State Bar No. 24003979

CERTIFICATE OF SERVICE

I do hereby certify that, November 14, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Timothy S. McCole
Scott R. Baker

I further certify that, on November 14, 2008, the foregoing has been served to the following non-CM/ECF participants by United States Mail, postage pre-paid:

William Clark
JTA Enterprises
16 Beech Place
Denville, NJ 07834

/s/ Merle R. Arnold III
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Texas State Bar No. 24003979