

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

STANLEY J. KOWALEWSKI and  
SJK INVESTMENT MANAGEMENT,  
LLC,

Defendants.

CIVIL ACTION NO.  
1:11-cv-0056-TCB

**NOTICE OF MOTION AND FILING OF  
SUPPLEMENTAL PLAN FOR ADMINISTRATION  
OF RECEIVER ESTATE AND DISTRIBUTION OF PROCEEDS**

NOTICE IS HEREBY GIVEN that, on June 15, 2012, S. Gregory Hays, the court-appointed “Receiver” for SJK Investment Management, LLC (“SJK”) and the SJK Special Opportunities Fund, LP (the “Special Opportunities Fund”) (collectively, the “Receiver Estate”), filed a Motion for Approval of Supplemental Plan for Administration of Receiver Estate and Distribution of Proceeds (the “Motion”), his Memorandum of Law in support of the Motion, his Supplemental Plan for Administration of Receiver Estate and Distribution of Proceeds (the “Supplemental Plan”), and a proposed Order approving the Supplemental Plan.

These documents can be found on the Receiver's website,

[www.haysconsulting.net](http://www.haysconsulting.net).

The Motion requests that the Court approve the Supplemental Plan, which sets forth and seeks the Court's approval of, among other things, the: (1) Receiver's proposed treatment of all claims submitted against Stanley J. Kowalewski, SJK, and/or the Special Opportunities Fund; (2) the assets from which the Receiver proposes approved claims against SJK and the SOF will be paid; (3) the activities of the Receiver and the professionals working with him (the "Receiver Team") with respect to the tax liabilities of the Receiver Estate; and (4) the activities of the Receiver and Receiver Team related to the administration of the SJK 401(k) Plan.

Each claimant that has not already agreed to the treatment of its claim proposed in the Supplemental Plan will have an opportunity to object to the Receiver's proposed treatment of its claim. The Receiver has requested that the Court resolve any objections through the use of the "summary proceedings" set forth in the Supplemental Plan. Other interested parties also have the right to object to the terms of the Supplemental Plan.

Your rights may be affected by the Court's ruling on the Motion and by the terms of the Supplemental Plan. **If you object to or oppose the Motion or the**

**Supplemental Plan, you must file a written objection with the Court no later than July 15, 2012, and appear at any hearing set by this Court regarding the Motion. Objections must be filed with the clerk of Court for the Federal District Court for the Northern District of Georgia, with a copy served on counsel for the Receiver, who is:**

Thomas B. Bosch  
TROUTMAN SANDERS LLP  
600 Peachtree Street, N.E.  
Suite 5200  
Atlanta, Georgia 30308-2216

Any objections that cannot be resolved between the parties will be resolved by the Court, either with or without hearing.

\* \* \*

The Receiver and his counsel are directed to serve the Motion, Supplemental Plan, Proposed Order, and this Notice on: all investors; all claimants who have submitted claims in this receivership; relevant federal, state, and local taxing authorities; and the United States Department of Labor. Service shall be made by electronic mail or the United States mail.

SO ORDERED, this \_\_\_ day of \_\_\_\_\_, 2012.

---

TIMOTHY C. BATTEN, Judge  
United States District Court  
Northern District of Georgia