

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

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

S. Gregory Hays, the court-appointed “Receiver” for SJK Investment Management, LLC and the SJK Special Opportunities Fund, LP, with the consent of Plaintiff Securities and Exchange Commission,<sup>1</sup> hereby moves this Court to approve and enter on the docket a Notice of Motion and Filing of Supplemental

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<sup>1</sup> Counsel for the Receiver attempted to contact counsel for Defendant Stanley J. Kowalewski to obtain Kowalewski’s consent to the filing of this Motion, but has not yet heard back from Kowalewski’s counsel. Counsel for the Receiver, however, has no reason to believe that Kowalewski’s counsel would not consent to the filing of this Motion.

Plan for Administration of Receiver Estate and Distribution of Proceeds (the “Notice”). A copy of the Notice is attached hereto as Exhibit A.

Contemporaneously with the filing of this Motion, the Receiver is filing his Motion for Approval of Supplemental Plan for Administration of Receiver Estate and Distribution of Proceeds. In that motion, the Receiver requests that the Court approve his Supplemental Plan for Administration of Receiver Estate and Distribution of Proceeds (the “Supplemental Plan”). The Supplemental Plan sets forth, among other things, the Receiver’s proposed treatment of claims against the Receiver Estate. The Notice provides investors, claimants, and other interested parties with information regarding the Receiver’s Supplemental Plan in order to establish an orderly process for addressing disputes regarding the claims addressed in the Supplemental Plan and other objections to the Supplemental Plan, if any. In order to provide this information to all interested parties, the Receiver requests that the Court enter the Notice on the docket on an expedited basis.

WHEREFORE, the Receiver respectfully requests that the Court approve and enter the Notice.

This 15<sup>th</sup> day of June, 2012.

*[Signatures on Following Page]*

/s/ J. David Dantzler, Jr.  
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*Attorneys for S. Gregory Hays,  
Receiver*

Consented to:

By: /s/ Alex Rue  
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*Attorneys for the Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **MOTION FOR EXPEDITED ENTRY OF NOTICE OF MOTION AND FILING OF SUPPLEMENTAL PLAN FOR ADMINISTRATION OF RECEIVER ESTATE AND DISTRIBUTION OF PROCEEDS** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 15<sup>th</sup> day of June, 2012.

*/s/ J. David Dantzler, Jr.* \_\_\_\_\_

J. David Dantzler, Jr.

Georgia Bar No. 205125