

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 1:13-cv-01036-LY
	§	
ROBERT A. HELMS, ET AL.,	§	
<i>Defendants,</i>	§	
	§	
and	§	
	§	
WILLIAM L. BARLOW AND GLOBAL CAPITAL	§	
VENTURES, LLC,	§	
<i>Relief Defendants, solely for the</i>	§	
<i>purposes of equitable relief.</i>	§	

**RECEIVER’S MOTION TO RESCHEDULE HEARING
CURRENTLY SET FOR SEPTEMBER 29, 2014**

COMES NOW Thomas L. Taylor III (“Receiver”), Court-appointed receiver in the above-styled enforcement action, and respectfully requests that the Court reschedule the hearing currently set for September 29, 2014 at 3:00 p.m.

On September 19, 2014, this Court set a hearing for September 29, 2014 at 3:00 p.m. with regard to the Receiver's "Motion for Order Approving Settlement" filed August 14, 2014 (Clerk's Doc. No. 88); the Receiver's "Motion for Order Approving Interim Application to Pay Fees Incurred by the Receiver and Other Professionals for the Quarter Ending June 30, 2014" filed August 14, 2014 (Clerk's Doc. No. 89); the Receiver's "Motion to Dissolve Asset Freeze as to Certain Residential Property" filed October 28, 2014 (Clerk's Doc. No. 92); the Receiver's "Motion for Entry of an Order (1) Rejecting Secured Claim of Clovis Capital Ventures, LLC; and (2) Authorizing the Sale of Certain Royalty Interests Free and Clear of All Liens, Claims and

Encumbrances" filed August 29, 2014 (Clerk's Doc. No. 95); Clovis Capital Ventures, LLC's ("Clovis") "Motion to Intervene" filed September 5, 2014 (Clerk's Doc. No. 99); Clovis's "Motion for Extension of Time to File Response in Opposition to Receiver's Motion for Entry of an Order (1) Rejecting Secured Claim of Clovis Capital Ventures, LLC; and (2) Authorizing the Sale of Certain Royalty Interests Free and Clear of All Liens, Claims and Encumbrances" filed September 5, 2014 (Clerk's Doc. No. 100); and the Receiver's "Motion for Entry of Order Confirming Sale of Certain Oil and Gas Interests of Receivership Estate and Receiver's Motion to Expedite Treatment of Previously Filed Motions" filed September 18, 2014 (Clerk's Doc. No. 110). *See* Clerk's Doc. No. 111.

The Receiver submits that he is scheduled to be in California on the current hearing date of September 29, 2014 for a previously scheduled medical appointment, and had made flight and hotel reservations and other accommodations for that trip prior to the Court's setting entered on September 19, 2014.

Counsel for the Receiver has conferred with counsel for the Commission and non-party Clovis Capital Ventures, LLC ("Clovis"), and with Defendants Helms and Kaelin and Relief Defendants, who do not oppose the resetting of the hearing as requested herein.

The Receiver and the Commission respectfully submit that they are available Tuesday September 30, 2014 to Thursday October 2, 2014, and also the week of October 6, 2014, excluding Thursday October 9, 2014. Clovis and Defendants Helms and Kaelin have informed undersigned counsel that they are available Tuesday October 7, Wednesday October 8 and Thursday October 9, 2014.

Counsel for the Receiver attempted to confer on September 22, 2014 with the remaining Defendants regarding this Motion, but as of the filing of this Motion has not received any response.

Dated: September 22, 2014

Respectfully submitted,

THE TAYLOR LAW OFFICES, P.C.



By: _____

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COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I certify that counsel for the Receiver has conferred with counsel for Plaintiff Securities and Exchange Commission and non-party Clovis, and with Defendants Helms and Kaelin, and the Relief Defendants, who do not oppose the rescheduling of the September 29, 2014 hearing sought herein. Counsel for Receiver attempted to confer with the remaining Defendants on September 22, 2014, but has not received any response as of the filing of this Motion.

/s/ Andrew M. Goforth
Andrew M. Goforth

