

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

THOMAS L. TAYLOR III, solely in his	§	
capacity as Court-appointed Receiver for	§	
Robert A. Helms, <i>et al.</i> ,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 15-cv-648-LY
	§	
GRADY H. VAUGHN III,	§	
Defendant.	§	

RECEIVER’S UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE REPLY

Plaintiff Thomas L. Taylor III (“Receiver”), solely in his capacity as Court-appointed Receiver in the civil action styled *SEC v. Helms, et al.*, Civil Action No. 1:13-cv-1036-ML (W.D. Tex. 2013), files this Unopposed Motion to Extend Deadline to File a Reply in support of his Motion for Partial Summary Judgment (the “Motion”) against Defendant Grady H. Vaughn III (“Defendant”). Receiver respectfully requests that the Court extend his reply deadline to Friday, January 8, 2016. In support thereof, the Receiver would show the Court as follows:

1. The Receiver filed the Motion on November 12, 2015. Dkt. 7.
2. The Defendant sought and was granted an extension of time to file a response to the Motion until December 14, 2015, which relief was unopposed by the Receiver. *See* Dkts. 13, 14.
3. The Receiver requires additional time to reply due to the holiday schedule and other case conflicts of the undersigned counsel.
3. Accordingly, the Receiver respectfully requests that the Court enter an order extending his deadline to reply to Friday, January 8, 2016.

4. The Receiver has conferred with the Defendant and the Defendant does not oppose the requested extension.

5. This extension is not requested for delay but so that justice may be done.

Dated: December 21, 2015

Respectfully submitted,

THE TAYLOR LAW OFFICES, P.C.

By: /s/ Andrew M. Goforth

Andrew M. Goforth
Texas State Bar: 24076405
goforth@ltaylorlaw.com

4550 Post Oak Place Drive, Suite 241
Houston, Texas 77027
Tel: (713) 626-5300
Fax: (713) 402-6154

COUNSEL FOR RECEIVER

CERTIFICATE OF CONFERENCE

I certify that counsel for Plaintiff Receiver conferred with counsel for Defendant Vaughn and that the relief requested herein is unopposed.

/s/ Andrew M. Goforth
Andrew M. Goforth

CERTIFICATE OF SERVICE

On December 21, 2015, I filed the foregoing document using the CM/ECF system for the Western District of Texas. All parties and counsel of record have been served electronically by and through the CM/ECF system.

/s/ Andrew M. Goforth
Andrew M. Goforth

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

THOMAS L. TAYLOR III, solely in his §
capacity as Court-appointed Receiver for §
Robert A. Helms, *et al.*, §
Plaintiff, §

v. §

Civil Action No. 15-cv-648-LY

GRADY H. VAUGHN III, §
Defendant. §

**ORDER GRANTING RECEIVER’S UNOPPOSED
MOTION TO EXTEND DEADLINE TO FILE REPLY**

Before the Court is Plaintiff Receiver’s Unopposed Motion to Extend Deadline to File Reply in support of the Receiver’s Motion for Partial Summary Judgment against Defendant Grady H. Vaughn III (the “Motion”). Having considered the Motion, and that it is unopposed, the Court GRANTS the relief requested and ORDERS that the Plaintiff’s deadline to file a Reply in Support for his Motion for Partial Summary Judgment is extended up to and including Friday, January 8, 2016.

SIGNED this _____ day of _____, 201____.

LEE YEAKEL
UNITED STATES DISTRICT JUDGE