

2. Defendant Janniece S. Kaelin is not admitted to practice law in any jurisdiction, nor admitted to practice before the United States District Court for the Western District of Texas.

3. On February 21, 2014 Plaintiff Securities and Exchange Commission filed its Motion for Clerk's Entry of Default as to Defendant Janniece S. Kaelin. (Dkt. 43) Plaintiff's certificate of service asserts that Plaintiff served Defendant Kaelin via email, but in fact Plaintiff failed to deliver electronic or personal service of the motion to Defendant Kaelin. The Clerk of the Court entered the Clerk's Entry of Default as to Janniece S. Kaelin on February 24, 2014 (Dkt. 45.) Defendant Kaelin was not served plaintiff's motion and had no notice of Plaintiff's motion and the Clerk's Entry of Default until Plaintiff delivered same on February 26, 2014 via UPS delivery. Defendant Janniece S. Kaelin intends to file her motion to set aside the Clerk's Entry of Default by February 28, 2014. See Declaration of Janniece S. Kaelin (Exhibit 1).

4. In order to properly and efficiently defend this suit, it is necessary for Defendant Janniece S. Kaelin to participate in the CM/ECF system to ensure proper notice of pleadings, and file pleadings with the Court in a timely manner. In order to do so, this Court should enter an Order allowing Defendant Janniece S. Kaelin to register with the CM/ECF system and file her pleadings electronically, and to receive notice of electronic filing as a Filing User participant in the system.

5. Defendant Janniece S. Kaelin has registered with PACER.

6. The United States District Court Western District of Texas E-Filing and E-Notification Registration Form requires approval of the Court to proceed as a non-prisoner pro se litigant.

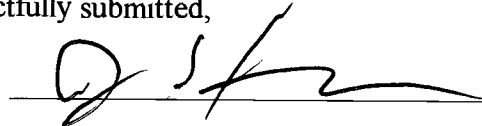
7. Defendant Janniece S. Kaelin is not incarcerated, on probation or supervised release and is otherwise eligible to register for electronic filing with this Court to become a registered Filing User.

WHEREFORE, premises considered, Defendant Janniece S. Kaelin respectfully requests that the Court enter an Order permitting her to register with CM/ECF and become a registered Filing User.

DATED: February 28, 2014.

Respectfully submitted,

By:



Janniece S. Kaelin
11708 Rydalwater Lane
Austin, Texas 78754
(512) 554-2976
Email: janniecekaelin@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2014 I filed the foregoing document with the Clerk of the Court for the Western District of Texas, Austin Division and that I notified all parties in the manner listed below:

By Email:

Timothy S. McCole
Christopher Davis
801 Cherry Street
Fort Worth, Texas 76102
Counsel for the Securities and Exchange Commission

Thomas L. Taylor III Court-Appointed Receiver
4550 Post Oak Place Drive, Suite 241
Houston, Texas 77027-3117
info@vendettaroyaltyreceivership.com
Counsel for Defendants Vendetta Royalty Partners, Ltd., Vendetta Royalty Management, LLC, Vesta Royalty Partners, LP, Vesta Royalty Management, LLC, Iron Rock Royalty Partners, LP, Iron Rock Royalty Management, LLC, Arcady Resources, LLC, Barefoot Minerals, G.P., G3 Minerals, LLC, Haley Oil Company, Inc., Lake Rock, LLC, Sebud Minerals, LLC and Technicolor Minerals, G.P.

Robert A. Helms, Deven Sellers, Roland Barrera and William Barlow
Pro Se Defendants


Janniece S. Kaelin
11708 Rydalwater Lane
Austin, Texas 78754
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Email: janniecekaelin@gmail.com

4. On February 21, 2014 Plaintiff Securities and Exchange Commission filed its Motion for Clerk's Entry of Default as to Defendant Janniece S. Kaelin (Dkt. 43) but failed to deliver electronic service of the motion to Defendant Kaelin as alleged in its Certificate of Service.

5. The Clerk of the Court entered the Clerk's Entry of Default as to Janniece S. Kaelin on February 24, 2014 (Dkt. 45.)

6. I was not served plaintiff's motion either electronically or by personal service, and had no notice of the filing of Plaintiff's motion and the Clerk's Entry of Default until February 26, 2014 via UPS Next Day Air, Tracking #1Z A37 81X A2 9950 6120 addressed to 11708 Rydalwater Lane, Austin, Texas. I was not served either physical or electronic copies of the motion of Plaintiff or the Clerk's Entry of Default from until delivery of the pleadings on February 26, 2014.

7. I intend to file my motion to set aside the Clerk's Entry of Default by February 28, 2014.


8. I am not registered with the CM/ECF system, therefore I did not receive a notice of filing from the Clerk of Court. In order to properly and efficiently defend this suit, it is necessary for me to participate in the CM/ECF system to ensure proper notice of pleadings, and file pleadings with the Court in a timely manner as a Filing User participant in the system.

9. I have registered with PACER.

10. I am not incarcerated, on probation or supervised release and I am otherwise eligible to register for electronic filing with this Court to become a Filing User.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON February 28, 2014.



Janniece S. Kaelin
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receive notice of electronic filings as a participant in the CM/ECF system and have the ability to file pleadings electronically using the system and that the Court hereby **GRANTS** the motion.

IT IS THEREFORE ORDERED:

Defendant Janniece S. Kaelin is hereby allowed to register with the CM/ECF system and is permitted to use this Order as evidence of the Court's approval to register with the CM/ECF system as required by the United States District Court Western District of Texas E-Filing and E-Notification Registration Form.

Dated: _____, 2014.

Honorable Judge Lee Yeakel
UNITED STATES DISTRICT COURT