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Attorneys for John A. Beckstead as Receiver

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MANAGEMENT SOLUTIONS, INC., a
Texas Corporation; WENDELL A.
JACOBSON; ALLEN R. JACOBSON,

Defendants.

**SECOND STIPULATED MOTION FOR
EXTENSION OF TIME FOR RECEIVER
TO RESPOND TO NBH BANK, N.A., f/k/a
BANK MIDWEST, N.A., as successor in
interest to HILLCREST BANK, N.A.'S
MOTION FOR ALLOWANCE OF
DEFAULT INTEREST**

Civil Action No. 2:11-cv-01165
Judge Bruce S. Jenkins

John A. Beckstead (the "Receiver"), as Receiver for Management Solutions, Inc. and related entities and the assets of Wendell A. Jacobson and Allen R. Jacobson, and intervenor NBH Bank, N.A., f/k/a Bank Midwest, N.A., as successor-in-interest to Hillcrest Bank, N.A. ("Hillcrest"), by and through their counsel of record, hereby stipulate, agree and move the Court to extend the time the Receiver shall have to respond to Hillcrest's Motion for Allowance of

Default Interest (Dkt. No. 748) from January 7, 2013, to January 21, 2013. The Court has previously granted one, two-week extension of the Receiver's time to respond to Hillcrest's motion. (*See* Dkt. No. 811.)

The Receiver and Hillcrest have reached an agreement in principle and are in the process of finalizing and documenting it. This stipulation is made in good faith and not for purposes of delay.

A Proposed Order is submitted herewith.

RESPECTFULLY SUBMITTED this 3rd day of January, 2013.

HOLLAND & HART LLP

/s/ J. Andrew Sjoblom

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/s/Tammy B. Georgelas

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N.A., as successor-in-interest to Hillcrest Bank,
N.A.*

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MANAGEMENT SOLUTIONS, INC., a
Texas Corporation; WENDELL A.
JACOBSON; ALLEN R. JACOBSON,

Defendants.

**ORDER GRANTING SECOND
STIPULATED MOTION FOR
EXTENSION OF TIME FOR RECEIVER
TO RESPOND TO NBH BANK, N.A., f/k/a
BANK MIDWEST, N.A., as successor in
interest to HILLCREST BANK, N.A.'S
MOTION FOR ALLOWANCE OF
DEFAULT INTEREST**

Civil Action No. 2:11-cv-01165
Judge Bruce S. Jenkins

The Court, having considered the Stipulated Motion for Extension of Time for Receiver to Respond to NBH Bank, N.A., f/k/a Bank Midwest, N.A., as successor-in-interest to Hillcrest Bank, N.A.'s ("Hillcrest") Motion for Allowance of Default Interest, HEREBY ORDERS THAT the Receiver shall have until Monday, January 21, 2013, to respond to Hillcrest's Motion for Allowance of Default Interest (Dkt. No. 748).

IT IS SO ORDERED.

DATED this ____ day of January, 2013.

BY THE COURT:

Hon. Bruce Jenkins
U.S. District Court, District of Utah

Approved as to form:

SNOW CHRISTENSEN & MARTINEAU

/s/ Tammy B. Georgelas
Kim R. Wilson
Tammy B. Georgelas
*Attorneys for NBH Bank, N.A.,
f/k/a Bank Midwest, N.A., as
successor-in-interest to Hillcrest Bank, N.A.*

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