

Lon A. Jenkins (USB #4060)
Nathan D. Thomas (USB #11965)
JONES WALDO HOLBROOK & McDONOUGH PC
170 South Main Street #1500
Salt Lake City, Utah 84101
Tel: 801-521-3200
Fax: 801-328-0537
lajenkins@joneswaldo.com
nthomas@joneswaldo.com

*Receiver for RCH2, LLC and Related
Entities and Attorneys for Receiver*

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

**U.S. COMMODITY FUTURES TRADING
COMMISSION,**

Plaintiff,

v.

**U.S. VENTURES LC, a Utah limited
liability company, WINSOME
INVESTMENT TRUST, an unincorporated
Texas entity, ROBERT J. ANDRES and
ROBERT L. HOLLOWAY,**

Defendants.

**MOTION TO APPROVE
STIPULATION REGARDING
PARTIAL ALLOWANCE OF CLAIM
NO. 1116**

Civil No. 2:11-CV-00099 BSJ

Honorable Bruce S. Jenkins

Lon A. Jenkins, Court-appointed Receiver for RCH2, LLC and the interests of RCH2, LLC and Robert Casey Hall in Related Entities (“**RCH2 Receiver**”), by and through counsel, and R. Wayne Klein, Court-Appointed Receiver (“**U.S. Ventures Receiver**”) for U.S. Ventures, LC (“**U.S. Ventures**”), Winsome Investment Trust (“**Winsome**”), and the assets of Robert J. Andres (“**Andres**”) and Robert L. Holloway (“**Holloway**”), hereby jointly move this Court for

an Order approving their Stipulation Regarding Allowance of Claim No. 1116 (“Stipulation”). The Stipulation is filed with the Court contemporaneous herewith. Under the Stipulation, Claim No. 1116 filed by the RCH2 Receiver is allowed as a claim against the U.S. Ventures, et al. receivership estate in the amount of \$3,314,788., to be paid in the same manner and on the same basis as other allowed claims against the receivership estate. Further, the RCH2 Receiver and the U.S. Ventures Receiver, on behalf of themselves and the parties for whose benefit they act, release one another from all claims, demands, obligations and causes of action. Other terms of the parties’ settlement can be found in the Stipulation filed herewith.

WHEREFORE, the RCH2 Receiver and the U.S. Ventures Receiver respectfully request this Court to enter an Order approving their Stipulation.

DATED this 17th day of May, 2013.

LON A. JENKINS, RECEIVER

/s/ Lon A. Jenkins

Lon A. Jenkins (USB #4060)

**JONES WALDO HOLBROOK &
McDONOUGH, PC**

170 South Main Street #1500
Salt Lake City, Utah 84101

R. WAYNE KLEIN, RECEIVER

/s/ R. Wayne Klein (with permission)

R. Wayne Klein

Klein & Associates

10 Exchange Place, Suite 502
Salt Lake City, Utah 84101