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Attorneys for Plaintiff R. WAYNE KLEIN, the
Court-Appointed Receiver

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

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.

**THE RECEIVER'S MOTION FOR
PERMISSION TO FINALIZE
SETTLEMENT AGREEMENTS**

Case No. 2:11CV00099 BSJ

Judge Bruce S. Jenkins

R. Wayne Klein, the Court-Appointed Receiver¹ (the "Receiver"), by and through his counsel of record, hereby notifies the Court that he has entered into five preliminary settlement agreements under which others have agreed to make payments or transfer assets to the Receiver

¹ The Receiver has been appointed over U.S. Ventures LC ("USV"), Winsome Investment Trust ("Winsome"), and all the assets of Robert J. Andres ("Andres") and Robert L. Holloway ("Holloway") (collectively the "Receivership Defendants").

in settlement of claims that the Receiver has asserted against them and moves for Court approval to finalize these settlements.

The Receiver believes these settlements are fair, reasonable, and in the best interests of the investors who provided money to US Ventures and Winsome. All but one of these settlements involve the return of all funds improperly paid to the party by Winsome, while the other provides for a recovery of 90% of the amount paid by entities placed under receivership.

The parties to these settlements, which are summarized in the accompanying memorandum, are:

1. PRDBJ, Inc.,
2. Scott Orchard,
3. Donald Lee,
4. Howard Patron, and
5. David and Betty Thorrez.

This motion is brought pursuant to Paragraphs 1 and 27 of the Order Granting Plaintiff's Ex Parte Motion for Statutory Restraining Order, Expedited Discovery, Accounting, Order to Show Cause re Preliminary Injunction and Other Equitable Relief (the "Receivership Order"). (Doc. #15.). Paragraph 1 of the Receivership Order vests the Court with jurisdiction over the parties and the subject matter of the receivership. Paragraph 27(i) of the Receivership Order authorizes the Receiver to initiate, defend, or compromise any actions or proceedings necessary to increase the assets of the receivership entities and to recover payments made improperly by the Receivership Defendants.

This motion is made and based on the memorandum in support filed contemporaneously herewith.

DATED this 26th day of October, 2011.

MANNING CURTIS BRADSHAW
& BEDNAR, LLC

/s/ David C. Castleberry
David C. Castleberry
*Attorneys for R. Wayne Klein, Court-Appointed
Receiver*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2011, I caused to be served in the manner indicated below a true and correct copy of the attached and foregoing **THE RECEIVER'S MOTION FOR PERMISSION TO FINALIZE SETTLEMENT AGREEMENTS** upon the following:

<input type="checkbox"/> VIA FACSIMILE	Kevin S. Webb
<input type="checkbox"/> VIA HAND DELIVERY	James H. Holl, III
<input type="checkbox"/> VIA U.S. MAIL	Gretchen L. Lowe
<input type="checkbox"/> VIA FEDERAL EXPRESS	U.S. Commodity Futures Trading Commission
<input type="checkbox"/> VIA EMAIL	1155 21 st Street, NW
<input checked="" type="checkbox"/> VIA ECF	Washington, DC 20581
	kwebb@cftc.gov
	jholl@cftc.gov
	glowe@cftc.gov

<input type="checkbox"/> VIA FACSIMILE	Jeannette Swent
<input type="checkbox"/> VIA HAND DELIVERY	US Attorney's Office
<input type="checkbox"/> VIA U.S. MAIL	185 South State Street, Suite 300
<input type="checkbox"/> VIA FEDERAL EXPRESS	Salt Lake City, UT 84111
<input type="checkbox"/> VIA EMAIL	Jeannette.Swent@usdoj.gov
<input checked="" type="checkbox"/> VIA ECF	<i>Attorneys for Plaintiff</i>

<input type="checkbox"/> VIA FACSIMILE	R. Wayne Klein
<input type="checkbox"/> VIA HAND DELIVERY	299 South Main, Suite 1300
<input type="checkbox"/> VIA U.S. MAIL	Salt Lake City, UT 84111
<input type="checkbox"/> VIA FEDERAL EXPRESS	
<input checked="" type="checkbox"/> VIA EMAIL	
<input type="checkbox"/> VIA ECF	

<input type="checkbox"/> VIA FACSIMILE	Robert L. Holloway
<input type="checkbox"/> VIA HAND DELIVERY	7040 Avenida Encinas #104-50
<input checked="" type="checkbox"/> VIA U.S. MAIL	Carlsbad, CA 92011
<input type="checkbox"/> VIA FEDERAL EXPRESS	vribob@gmail.com
<input type="checkbox"/> VIA EMAIL	
<input type="checkbox"/> VIA ECF	

VIA FACSIMILE
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/s/ David C. Castleberry