

E. Leon Harward
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE COMMISSION,

PLAINTIFF

v.

NATIONAL NOTE OF UTAH, LC, a Utah Limited
Liability Company and WAYNE LaMAR PALMER,

An individual,

DEFENDANTS

REQUEST TO RECONSIDER
TO INTERVENE

Case: 2:12cv00591

Assigned To: Jenkins, Bruce

Assign : 6/25/2012

**Description: SEC v. Utah Note of
Utah et al**

Comes now Leon Harward requests the court to reconsider its previous denial and allow and grant the right to intervene in this case on the grounds that:

1. Leon Harward now is a thirty percent owner of Expressway Business Park. That ownership was executed in a sale and purchase agreement dated November 18, 2013. A copy of the purchase and sale agreement is attached.
2. In a hearing, on the 12th day of October the court determined that West Side Enterprises was the owner and that Leon Harward could not represent West Side Enterprises because he was not an attorney.
3. Since Harward has had consistent involvement, in some capacity, Harward and West Side entered in the Purchase and Sale Agreement, a copy of which is attached.

4. Harward hereby requests the court reconsider the request to intervene based upon the clarification of ownership as represented in the Sale and Purchase Agreement.
5. The court, in the earlier hearing, recognized the 30 percent ownership rights of Expressway.
6. The intervener's request is to pursue its ownership rights as an equity owner and not be subjected to the receiver's claim of 100 percent of Expressway assets.
7. The court has determined that the liens and other encumbrances were imposed through illegal process. The attempt to recover "investor" monies is against Homeland and Wayne Palmer and not Expressway Business Park
8. Harward and Expressway are not and never have been part of the ongoing claims against the defendants.
9. To deprive the minority holders of their equity without due process is completely beyond reason
10. With the indication of ownership now and entirety of the 30 percent is in the control Harward, Harward requests the approval of the right to intervene.
11. A copy of the purchase and sale agreement has been hand delivered to Wayne Klein.

Respectfully Submitted:

E. Leon Harward

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