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7  
8 **SUPERIOR COURT OF ARIZONA**  
9 **MARICOPA COUNTY**

10 ARIZONA CORPORATION  
11 COMMISSION

12 Plaintiff,

13 v.

14 MATHON MANAGEMENT COMPANY,  
L.L.C., fka an Arizona limited liability  
15 company now dba a Delaware limited  
liability company, SLADE WILLIAMS AND  
16 ASSOCIATES, L.L.C., an Arizona limited  
liability company, MATHON FUND I,  
17 L.L.C., an Arizona limited liability company,  
MATHON FUND, L.L.C., fka an Arizona  
18 limited liability company now dba a  
Delaware limited liability company,  
19 INTEGRITY101, L.L.C., an Arizona limited  
liability company, INTEGRITY 201, L.L.C.,  
20 an Arizona limited liability company,  
INTEGRITY 301, L.L.C., and Arizona  
21 limited liability company, INTEGRITY401,  
L.L.C., an Arizona limited liability company,  
22 INTEGRITY 501, L.L.C., an Arizona limited  
liability company, INTEGRITY 601, L.L.C.,  
23 an Arizona limited liability company,  
INTEGRITY 701, L.L.C., an Arizona limited  
24 liability company, INTEGRITY 801, L.L.C.,  
an Arizona limited liability company,  
25 INTEGRITY 901, L.L.C., an Arizona limited  
liability company, ROUND VALLEY  
26 CAPITAL, L.L.C., an Arizona limited  
liability company, W.S.F. – WORLD  
27 SPORTS FANS, L.L.C., an Arizona limited  
liability company, MILL CREEK, L.L.C., an  
28 Arizona limited liability company,

Case No. CV 2005-005484

**MOTION FOR AN  
EXPEDITED HEARING**

(Assigned to the Honorable  
Barry C. Schneider)

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012

1 BELLEVUE HOLDINGS, L.L.C., an  
2 Arizona limited liability company, OAK  
3 HARBOR FINANCIAL, L.L.C., an Arizona  
4 limited liability company, SW STRATEGIC,  
5 WEALTH ADVISORS, L.L.C., an Arizona  
6 limited liability company, EVERETT  
7 CAPTIAL, L.L.C., an Arizona limited  
8 liability company, CRE CAPITAL, L.L.C.,  
9 an Arizona limited liability company,  
10 MEZZANINE MANAGEMENT, L.L.C., an  
11 Arizona limited liability company,  
12 MEZZANINE FUND I, L.L.C., an Arizona  
13 limited liability company, JONAS FUND I,  
14 L.L.C., an Arizona limited liability company,  
15 TEMPLAR FUND L.L.C., fka an Arizona  
16 limited liability company now dba a  
17 Delaware limited liability company,  
18 MERCER ISLAND, L.L.C., an Arizona  
19 limited liability company, CONNECTICUT  
20 PROPERTIES, L.L.C., an Arizona limited  
21 liability company, FIRST ATLANTA  
22 INVESTMENTS, L.L.C., a Georgia limited  
23 liability company, MM COLONIAL FUND,  
24 L.L.C., a Delaware limited liability company,  
25 SLADE CONSTRUCTION, L.L.C., an  
26 Arizona limited liability company,  
27 DUANE SLADE and JENNIFER SLADE,  
28 husband and wife, GUY ANDREW  
WILLIAMS and LISA WILLIAMS, husband  
and wife,

Defendants.

18  
19 James C. Sell, the court appointed Conservator in the above-referenced matter,  
20 through counsel of record undersigned, hereby requests an accelerated hearing on his  
21 *Motion To Authorize Conservator To Distribute The First Interim Distribution To*  
22 *Creditors* (the “First Interim Distribution Motion”), which has been filed  
23 contemporaneously herewith.

24 The Order appointing the Conservator anticipated that certain urgent matters would  
25 arise within the Conservatorship proceeding which would require immediate action. To  
26 address this concern, paragraphs 18 and 19, of the Conservatorship Order were  
27 intentionally included to provide that the Conservator “may request relief on an expedited  
28 basis” when he is compromising claims or liquidating Conservatorship assets.

1 The need for the First Interim Distribution Motion to be heard on an expedited  
2 basis is twofold.

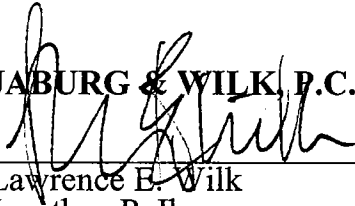
3 First, there is a surplus of funds in the Conservatorship Estate which would be  
4 more efficiently distributed directly to creditors than be kept in the Conservatorship  
5 Estate, and thereby burden the Estate with their administration. Specifically, the  
6 Conservator is presently holding \$15,389,150.00 of which he intends to distribute  
7 \$10,500,000.00 as part of the First Interim Distribution. Further, as set forth in the First  
8 Interim Distribution Motion, the Conservator anticipates to receive an additional  
9 \$13,050,000.00 on September 15, 2005, which could also be made a part of the First  
10 Interim Distribution.

11 Second, the Conservator is aware that many of the Estate's Creditors are  
12 experiencing severe financial hardship, which could be helped by the timely receipt of  
13 such funds.

14 Consequently, it is imperative that this Hearing be held on an expedited basis, so  
15 that the Conservator can distribute monies - not needed by the Conservatorship Estate -  
16 and put those monies into the hands of creditors who have an immediate need for such  
17 funds.

18 DATED this 12 day of September, 2005.

19 JABURG & WILK, P.C.

20   
21 Lawrence E. Wilk  
22 Jonathan P. Ibsen  
23 Attorneys for James C. Sell, Conservator

24 **ORIGINAL** filed and **COPY**  
25 of the foregoing hand-delivered this  
26 12<sup>th</sup> day of September, 2005 to:

27 The Honorable Barry C. Schneider  
28 MARICOPA COUNTY SUPERIOR COURT  
101 West Jefferson, CCB 13A  
Phoenix, Arizona 85003-2243

1 **COPIES** of the foregoing mailed and  
2 emailed this 12<sup>th</sup> day of September, 2005 to:

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