

should apply to her. In addition, the Receiver initially was granted the authority to review Holt's mail for the purpose of identifying Holt's assets, but the Receiver has now had more than sufficient time to identify Holt's assets. Holt therefore objects to the Receiver's continued review of her mail – an unwieldy process that has caused months of delay in receiving important family-related bills and countless personal notes from friends, family, and church members.

3. Holt also requests that, in issuing an amended receivership order, the Court clarify that the amended order does not amend or alter any of the Court's prior rulings relating to proceeds of the D&O Policy. Holt requested that the Receiver make this clarification in the proposed Second Amended Receivership Order, but the Receiver refused to do so.

4. Holt understands that there are pressing reasons why the SEC and the Receiver want the Court to enter the proposed Second Amended Receivership Order. To avoid any unnecessary delay in approval of the requested proposed Second Amended Receivership order, Holt will file a separate motion to amend the receivership order. In the meantime, except for the relief in the joint motion which Holt does not oppose, Holt specifically reserves all potential grounds for modifying the receivership order, including grounds not identified in this response.

DATED this 8th day of February, 2010

Respectfully submitted,

/s/ Jeffrey M. Tillotson, P.C.

Jeffrey M. Tillotson, P.C.

Texas Bar No. 20039200

John Volney

Texas Bar No. 24003118

Christopher J. Akin

Texas Bar No. 00793237

LYNN TILLOTSON PINKER & COX, L.L.P.

2100 Ross Avenue, Suite 2700

Dallas, Texas 75201

(214) 981-3800 Telephone

(214) 981-3839 Facsimile

jmt@lynnllp.com

jvolney@lynnllp.com

cakin@lynnllp.com

Erik A. Christiansen (*pro hac*)

Brent R. Baker (*pro hac*)

PARSONS BEHLE & LATIMER

One Utah Center

201 South Main Street, Suite 1800

Post Office Box 45898

Salt Lake City, Utah 84145-0898

(801) 532-1234 Telephone

(801) 536-6111 Facsimile

echristiansen@pblutah.com

bbaker@pblutah.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served *via ECF* on counsel of record on this the 8th day of February, 2010

/s/ Christopher J. Akin _____

Christopher J. Akin