

1 ALAN H. MARTIN, Cal. Bar No. 132301
amartin@sheppardmullin.com
2 MATTHEW B. HOLBROOK, Cal. Bar No. 280729
mholbrook@sheppardmullin.com
3 SHEPPARD MULLIN RICHTER & HAMPTON LLP
650 Town Center Drive, 4th Floor
4 Costa Mesa, California 92626-1993
Telephone: 714-513-5100
5 Facsimile: 714-513-5130

6 Attorneys for THOMAS A. SEAMAN,
RECEIVER
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION
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11 SECURITIES AND EXCHANGE
COMMISSION,
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Plaintiff,
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v.
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LAMBERT VANDER TUIG (a/k/a/
15 LAMBERT VANDER TAG a/k/a/
DEAN I. VANDER TAG), THE
16 CAROLINA DEVELOPMENT
COMPANY, INC. (a/k/a THE
17 CAROLINA COMPANY AT
PINEHURST, INC.), AND
18 JONATHAN CARMAN,

Defendants.
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Case No. 8:06-cv-00172-AHS-MLG

**NOTICE OF MOTION TO SELL
REAL PROPERTY, CONCLUDE
AFFAIRS OF THE
RECEIVERSHIP, APPROVE
RECEIVER'S FINAL ACCOUNT &
REPORT, AND DISCHARGE
RECEIVER**

Hearing:

Date: April 25, 2016

Time: 9:30 a.m.

Place: Courtroom 650

255 East Temple Street

Los Angeles, California 90012

Judge: Hon. George H. King

Complaint Filed: February 16, 2006

1 PLEASE TAKE NOTICE that on April 25, 2016 at 9:30 a.m. in Courtroom
2 650 of the Edward R. Roybal Federal Building and United States Courthouse,
3 located at 255 East Temple Street, Los Angeles, California 90012, Chief Judge
4 George H. King presiding, Thomas A. Seaman, duly-appointed receiver herein (the
5 “Receiver”), will seek approval to sell real property, conclude the affairs of the
6 receivership, approve the Receiver’s Final Account & Report, and discharge the
7 Receiver.

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9 In connection with the foregoing, the Receiver requests the Court order:
10 1) sale of the remaining real property held by the Receiver for a net cash payment of
11 \$10,000 and mutual releases of the Receiver and the real property buyer; 2) an
12 additional distribution to Delbert Reedy of \$41,764.61; 3) distribution of any
13 previously un-negotiated checks to the remaining claimants; 4) payment of any final
14 distribution checks which remain un-negotiated after 120 days to the Securities &
15 Exchange Commission; 5) payment of an IRS civil penalty of \$3,000, if not abated;
16 6) the Receiver to destroy the books & records of the receivership entities;
17 7) approval of the Receiver’s Final Account and Report and that the actions taken by
18 the Receiver are hereby ratified, confirmed and approved as being right and proper
19 and in the best interest of the receivership estate and parties to this action;
20 8) payment of the surplus to investor/claimants; and 9) any other orders the Court
21 deems just.

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23 The Motion is posted on the Receiver’s website (www.carolina
24 receivership.com). A hard copy can also be obtained by emailing a request to the
25 Receiver through the website or by sending a written request to the Receiver at
26 3 Park Plaza, Suite 550, Irvine, California 92614.

1 If you oppose the Motion, you are required to file your written opposition
2 with the Office of the Clerk, United States District Court, 255 East Temple Street,
3 Los Angeles, California 90012, and serve the same on the undersigned not later
4 than twenty-one (21) days before the date designated for the hearing of the Motion.
5

6 Dated: March 21, 2016
7

8 SHEPPARD MULLIN RICHTER & HAMPTON LLP
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10 By /s/ Matthew B. Holbrook
11 ALAN H. MARTIN
12 MATTHEW B. HOLBROOK

13 Attorneys for Receiver
14 THOMAS A. SEAMAN
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