

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities,)	
<u>ex rel.</u> Irving L. Faight, Administrator,)	
)	
Plaintiff,)	
)	
vs.)	Case No. CJ-99-2500-66
)	Judge Daniel L. Owens
Accelerated Benefits Corporation, a Florida)	
Corporation, <i>et al.</i> ,)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE AND CONTINUE HEARING**

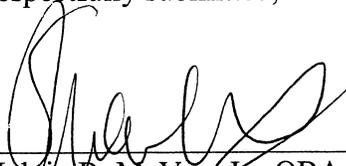
The Conservator, H. Thomas Moran, II (the "Conservator"), respectfully moves the Court for an order extending the time to respond to the Motion for an Order Approving Sale of Conservatorship Assets filed by Acheron Portfolio Trust ("Acheron") until February 17, 2010 and to continue the hearing that is currently set on the Motion. The Conservator makes this Motion on his behalf and on behalf of the Oklahoma Department of Securities ("ODS"). In support of this Unopposed Motion, the Conservator states as follows:

1. Acheron does not object to the requested extension of time or the continuance of the hearing date.
2. On January 15, 2010, Acheron filed its Motion. The Conservator's counsel and the ODS did not receive Acheron's Motion until January 20th. Their responses are currently due on February 4th.
3. The Conservator and ODS require additional time to respond to Acheron's Motion as it involves numerous statements of facts and arguments concerning the Option Purchase Agreement ("OPA") approved by the Court in 2006 and proposed revisions to the terms of the OPA between Acheron and the Conservator, in particular changes to the payment terms.

4. The Conservator and ODS further request the Court to continue the hearing currently set for February 19, 2010 to March 12, 2010, or a later date if necessary to accommodate the Court's schedule.

WHEREFORE, the Conservator, H. Thomas Moran, II requests the Court to extend the time to respond to the Motion for an Order Approving Sale of Conservatorship Assets to February 17, 2010 and to continue the hearing on the Motion to March 12, 2010.

Respectfully submitted,



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***Attorneys for Conservator.
H. Thomas Moran, II***

CERTIFICATE OF MAILING

The undersigned certifies that on the 4th day of February, 2010, a true and correct copy of the foregoing Notice of Hearing was mailed, first-class with postage prepaid, to:

Patricia A. Labarthe, Esq.
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Attorney for Plaintiff

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***Attorney for Defendants,
Accelerated Benefits Corporation and
American Title Company of Orlando***