

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. )  
 ) Case No. 4:12-cv-00080-CEJ  
BURTON DOUGLAS MORRISS, et al., )  
 )  
Defendants, and )  
 )  
MORRISS HOLDINGS, LLC, )  
 )  
Relief Defendant. )  
 )

**RECEIVER’S NOTICE OF NO OBJECTION AND  
REQUEST FOR ENTRY OF AN ORDER ON  
RECEIVER’S MOTION TO ESTABLISH CLAIMS BAR DATE,  
APPROVE MANNER AND FORM OF NOTICE OF CLAIMS BAR DATE AND  
APPROVE PROCESS FOR SUBMITTING CLAIMS**

By Order entered January 17, 2012, the Court appointed Claire M. Schenk as Receiver (“Receiver”) over Acartha Group, LLC, MIC VII, LLC, Acartha Technology Partners, LP and Gryphon Investments III, LLC (collectively, the “Receivership Entities”). On December 3, 2012, the Receiver filed her Motion to Establish Claims Bar Date, Approve Manner and Form of Notice of Claims Bar Date and Approve Process for Submitting Claims (the “Motion”), Memorandum in Support of Motion and Exhibits A-D. *See* Dkt. #214; Dkt. #215.

In the Motion, the Receiver sought an order from the Court (i) establishing 5:00 p.m. Central Standard Time on the date that is sixty (60) days after entry of the Court’s order as the deadline for the filing of claims against the Receivership Entities and the Receivership Estate, (ii) establishing the procedures for, and guidelines governing, the submission of claims, as

outlined in the proposed claims bar date order attached hereto as Exhibit A,<sup>1</sup> (iii) approving the form and manner of the proposed notices of the claims bar date, attached hereto as Exhibits B and D, (iv) directing that claimants submitting claims after the bar date be forever barred, estopped, and enjoined to the fullest extent allowed by applicable law from asserting, in any manner, such claim against the Receivership Entities and their respective estates or property, as provided for in the proposed claims bar date order, and (v) directing that submission of a proof of claim form will subject the claimant to the jurisdiction of the United States District Court for the Eastern District of Missouri. The Receiver served a copy of the Motion and accompanying papers upon all parties receiving notice in this case. Objections to the relief requested in the Motion were due on or before Thursday, December 13, 2012. *See* E.D.Mo. L.R. 7-4.01(B); Fed. R. Civ. P. 6. No objections have been filed.

Additionally, on December 7, 2012, the Receiver posted a copy of the Motion and accompanying papers on the Receiver's external website, at [http://www.thompsoncoburn.com/news-and-information/acartha-receivership-information/recent\\_developments.aspx](http://www.thompsoncoburn.com/news-and-information/acartha-receivership-information/recent_developments.aspx). The Receiver's posting permitted investors and other parties-in-interest access to the Motion and accompanying papers.

Considering that (i) parties in the case, investors and other parties-in-interest have had time to review the Receiver's Motion and accompanying papers and (ii) no objections to the relief requested in the Motion have been filed, the Receiver respectfully requests that the Court grant the Motion and enter the proposed claims bar date order (attached hereto as Exhibit A).

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<sup>1</sup> All exhibits attached to this Notice of No Objection were originally attached to the Receiver's Memorandum in Support of Motion.

Respectfully Submitted,

THOMPSON COBURN LLP

Dated: December 17, 2012

By           /s/ Kathleen E. Kraft            
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2012, I electronically filed the foregoing with the Clerk of the Court through the Court's CM/ECF system which will send a notice of electronic filing to the following:

Catherine L. Hanaway, Esq.  
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Brian T. James  
Securities and Exchange Commission  
801 Bricknell Avenue, Suite 1800  
Miami, Florida 33131  
*Attorneys for Plaintiff*

I further certify that on December 17, 2012, I served the foregoing document by First Class U.S. Mail on:

Morriss Holdings, LLC  
7820 Maryland Ave.  
St. Louis, Missouri 63105

Morriss Holdings, LLC  
c/o Corporation Service Company  
221 Bolivar Street  
Jefferson City, Missouri 65101

/s/ Kathleen E. Kraft