

**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.)
)

**SUPPLEMENTAL MEMORANDUM REGARDING RECEIVER’S
MOTION FOR SALE OF PREFERRED AND COMMON SHARES OF POLLEN, INC.
AND REQUEST FOR THE COURT TO HOLD THE RECEIVER’S MOTION IN
ABEYANCE PENDING A FURTHER FILING BY THE RECEIVER**

On November 14, 2013, the Receiver filed her Motion for Sale of Preferred and Common Shares of Pollen, Inc. (Dkt. Nos. 293, 294) (the “Motion”), seeking Court authorization to sell the Receivership’s 1,656,299 shares of Series A Preferred Stock (the “Preferred Stock”) and 31,764 shares of Series B Common Stock (the “Common Stock”) in Pollen, Inc. (together, the “Shares”) to Pollen, Inc. (“Pollen”).

The Receiver engaged H. Edward Morris, Jr. of CliftonLarsonAllen LLP to assist the Receiver in determining the reasonableness of Pollen’s offer. Mr. Morris based his conclusions on the reasonableness of Pollen’s offer in part on current information available to the Receiver and information provided by Pollen.

After the filing of the Motion, the Receiver received potential material information which the Receiver believes may impact Mr. Morris’s conclusions regarding the reasonableness of

Pollen's offer. The Receiver is gathering this information for evaluation by Mr. Morris and the Receiver's professionals.

As such, the Receiver requests that the Court hold the Receiver's Motion in abeyance to give the Receiver, her professionals, and Mr. Morris the opportunity to review and evaluate this information and, if necessary, file additional information with the Court regarding the proposed sale. Once the Receiver, Mr. Morris, and the Receiver's professionals have reviewed the potential material information, the Receiver will file a supplemental motion with the Court regarding the Receiver's intention to proceed with the proposed sale.

Dated: November 27, 2013

Respectfully Submitted,

THOMPSON COBURN LLP

By /s/ Kathleen E . Kraft

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CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2013, 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:

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