

**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 AND  
REQUEST FOR ABEYANCE OF OBJECTION OF  
HANY TEYLOUNI TO RECEIVER’S NOTICE OF DETERMINATION**

The Receiver requests that the Court hold in abeyance the objection of Hany Teylouni due to potential material information the Receiver received after the claims process closed for Mr. Teylouni’s claim.

On July 31, 2014, Claimant Hany Teylouni (Claim No. 20) filed his Objection to the Receiver’s Notice of Determination (the “Objection”) regarding his claim. On September 2, 2014, the Receiver filed the Receiver’s Response to Objection of Hany Teylouni. Mr. Teylouni then filed a Reply in Support of Hany Teylouni’s Objection to Receiver’s Notice of Determination on September 5, 2014. Mr. Teylouni’s objection is currently pending before the Court.

During the course of the claims process, Mr. Teylouni provided the Receiver with documentation and written and oral responses to questions. The Receiver based her Notice of Determination, in part, on the information that Mr. Teylouni provided the Receiver. After the

claims process concluded and after Mr. Teylouni filed his reply in support of his objection, the Receiver received potential material information (the “Information”) that may be relevant to the allowance of Mr. Teylouni’s claim and the pending Objection. The unsolicited Information was provided by a Federal agency on or about September 29, 2014 and is inconsistent with facts the Receiver had when issuing her Notice of Determination. In particular, the Information raises a question regarding whether any, or all, of the claimed amount for deferred compensation may have been paid. In an effort to resolve this issue, the Receiver sent a letter to Mr. Teylouni’s counsel on February 25, 2015, and asked that Mr. Teylouni provide clarification regarding the apparent inconsistency by March 3, 2015. On March 3 and March 17, 2015, Mr. Teylouni’s counsel notified the Receiver that he had not received a response yet from Mr. Teylouni. As of this filing, Mr. Teylouni has not provided the Receiver with any additional information that addresses the apparent inconsistency.

As such, the Receiver requests that the Court hold Mr. Teylouni’s Objection in abeyance until Mr. Teylouni provides the additional information necessary to fully review his claim. During this time, the Receiver plans to review and evaluate the information requested from Mr. Teylouni and to update the Receiver’s filings with the Court regarding the claim, as appropriate.

Dated: March 19, 2015

Respectfully Submitted,

THOMPSON COBURN LLP

By /s/ Kathleen E. Kraft

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2015, 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 all parties receiving CM/ECF service.

/s/ Kathleen E. Kraft