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7 SUPERIOR COURT OF ARIZONA

8 MARICOPA COUNTY

9 ARIZONA CORPORATION COMMISSION,

10 Plaintiff,

11 v.

12 AMERICAN NATIONAL MORTGAGE
13 PARTNERS, L.L.C., et al.

14 Defendants.

Case No: CV2003-005724

**MOTION FOR EXPEDITED HEARING
ON RECEIVER'S MOTION TO
AUTHORIZE SETTLEMENT
REGARDING TONY LUNGARO AND TN
CORPORATION**

(Assigned to the Honorable J. Richard Gama)

15 James C. Sell, court appointed Receiver, ("Receiver"), hereby requests an expedited
16 hearing on his *Motion To Authorize Settlement Regarding Tony Lungaro and TN Corporation*,
17 filed concurrently herewith.

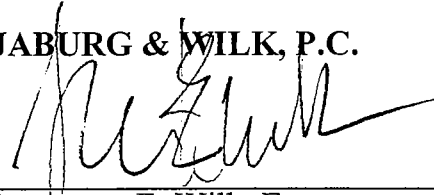
18 The proposed settlement resolves collection of two outstanding promissory notes owed to
19 the Receivership Estate. In agreeing to a payoff figure, the Receiver has agreed to waive certain
20 penalties allowed under the terms of the subject promissory note. Accordingly, the settlement
21 agreement is subject to approval by this Court.

22 It is expected that the settlement payment may come from the proceeds of the sale of the
23 property securing payment of the subject notes and a payoff figure for release of the two
24 mortgages securing payment of the two promissory notes is necessary for calculation of the
25 closing figures. The closing is scheduled to take place on April 30, 2004, or as soon thereafter as
26 Court approval is obtained. In order to ensure that the closing occurs, expedited relief is required.

1 WHEREFORE, the Receiver respectfully requests that this Court set an expedited hearing
2 on the *Motion to Authorize Settlement Regarding Tony Lungaro and TN Corporation* and enter
3 such further relief as it deems just and proper.

4 DATED this 27 day of April, 2004.

5 **JABURG & WILK, P.C.**

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Lawrence E. Wilk, Esq.
Attorneys for James C. Sell

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10 **ORIGINAL** filed and **COPY**
11 of the foregoing hand-delivered
this 27th day of April, 2004 to:

12 The Honorable Richard J. Gama
13 MARICOPA COUNTY SUPERIOR COURT
101 West Jefferson, ECB 611
Phoenix, Arizona 85003-2243

14 **COPIES** of the foregoing mailed
15 this 27th day of April, 2004 to:

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Court Appointed Receiver

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