

CAUSE NO. D-1-GV-10-000454

STATE OF TEXAS	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
RETIREMENT VALUE, LLC,	§	
RICHARD H. "DICK" GRAY, HILL	§	
COUNTRY FUNDING, LLC, a Texas	§	
Limited Liability Company, HILL	§	
COUNTRY FUNDING, a Nevada Limited	§	
Liability Company, and WENDY ROGERS	§	TRAVIS COUNTY, TEXAS
<i>Defendants,</i>	§	
	§	
AND	§	
	§	
KIESLING, PORTER, KIESLING,	§	
& FREE, P.C.,	§	
<i>Relief Defendant</i>	§	
	§	
AND	§	
	§	
JAMES SETTLEMENT SERVICES, LLC,	§	
RONALD L. JAMES, DONALD JAMES,	§	
MICHAEL BESTE, MILKIE/FERGUSON	§	
INVESTMENTS, INC., EDWARD MILKIE,	§	
DAN LEVIN, MANNY AIZEN, MARCO	§	
LOPEZ, GALLAGHER FINANCIAL	§	
GROUP, INC., W. NEIL ("DOC")	§	
GALLAGHER, MICHAEL MCDERMOTT,	§	
SENIOR RETIREMENT PLANERS, LLC	§	
JAMES POE, FELLOWSHIP FINANCIAL,	§	
LLC, MICHAEL EASTHAM, ESTATE	§	
PROTECTION PLANNING	§	
CORPORATION, SALVATORE	§	
MAGARACI, SECURED FINANCIAL	§	
STRATEGIES, LLC, REID H.	§	
THORBURN, BRIAN R. CERVENKA,	§	
NICHE INVESTMENT GROUP, LLC,	§	
EDMOND SANSING, DAMIEN	§	
PACHACEK, SHANE CORNETT,	§	
RAZOR FINANCIAL SERVICES, LLC,	§	

JAMES S. IKEY, BRIDY S. IKEY, SENIOR §
 TEXAN ESTATE PLANNING SERVICES, §
 LLC, WILLIAM EVANS, MIKE AHLERS, §
 DARRILL S. BEEBE, PC&S, LLC, §
 GLOBAL ONE DIRECT, LLC, DAVID A. §
 SHIELDS, STEVE FEEKEN, JOSEPH T. §
 DONNANTUONI, FIRST COVENANT §
 FINANCIAL PARTNERS, LLC, PAUL §
 BROST, DAVID DOLPH, RONALD R. §
 COLEMAN, CHARLES DAVID GRAY, §
 GARY J. LENAHAM, EARL BROWN, §
 MIOKE GIVILANCZ, JR., KIP §
 HARTMAN, MICHAEL A. CASTELLANO, §
 JOHN P. FISH, JOEL FRANKLIN, W. §
 JUSTIN TITLE, DAVID RICE, JAMES §
 WILLIAM RASH, DAVID MATA, IAM §
 FINANCIAL SERVICES, INC., AND §
 DAVID J. HERZOG, SCOTT §
 SCHROEDER §
Third-Party Defendants §

126TH JUDICIAL DISTRICT

OBJECTION TO HCF RECEIVER’S APPLICATION
FOR FEES FOR ACTUARIAL SERVICES

NOW COMES Wendy Rogers, by and through her undersigned attorneys and files this, her objection to the above referenced application and would show as follows:

1. On October 31, 2011 the HCF Receiver filed an application to pay over \$14,000.00 to an actuarial firm. Although the application contains two separate invoices, those invoices do not provide sufficient detail to enable the reader to determine exactly what work was performed and by whom, other than in a very general and summary fashion.
2. Additionally, the services performed are of questionable value to the estate. The Receiver claims that the services were necessary because the insurance companies on HCF’s five life insurance policies refused to provide information as to the lowest premium payment that could

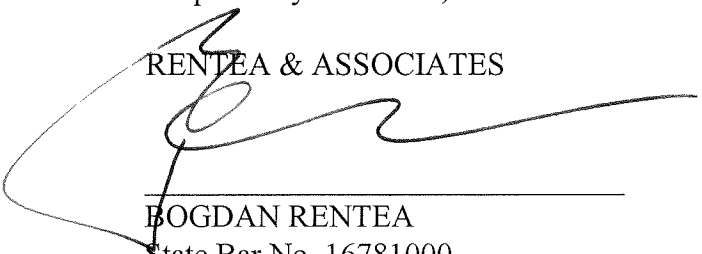
be made on each policy to keep them in force. The Receiver claims that the calculation has now been made and the policies can be maintained in force through the spring of 2012. The Receiver has however not stated whether the insurance companies have accepted the lower premium payments nor provided this Court with a cost benefit analysis comparing the alleged savings to the fees incurred.

3. Therefore, this objection is filed and this Defendant requests that the Court deny the application in its current form and reserves her rights to further object should the application be amended and more detailed information provided.

WHEREFORE, PREMISES CONSIDERED, this Defendant respectfully requests that this application by the HCF Receiver be denied in all respects and for such other and further relief to which she may show herself justly entitled.

Respectfully submitted,

RENTEA & ASSOCIATES



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**ATTORNEY FOR WENDY
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on this 10 day of November 2011 as indicated below:

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