

to pay taxes (even though no taxes are currently owed) and repair assets owned by Venus 59. As with prior motions,¹ Crow is not a party in this proceeding, has not shown entitlement to intervene or justified the burden or expense on the Receivership Estate incident to his request for “discovery,” and has not provided any justification for extracting Venus 59 from the Receivership Estate. Crow thus provides no basis for the requested judgment or any additional relief he seeks. The Receiver accordingly opposes the relief requested by Crow, and requests that the Court deny Crow’s request.

Respectfully submitted,

By: /s/Timothy B. Wells

Charlene C. Koonce

State Bar No. 11672850

charlene@brownfoxlaw.com

Timothy B. Wells

Texas Bar No. 24131941

tim@brownfoxlaw.com

BROWN FOX PLLC

8111 Preston Road, Suite 300

Dallas, Texas 75225

T: (214) 327-5000

F: (214) 327-5001

Attorneys for Receiver Cortney C. Thomas

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court’s electronic-filing system.

¹ The Receiver incorporates by reference his responses to Crow’s prior motions, Dkt Nos. 380, and 484.