

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

United States of America,

Plaintiff,

Civil No. 08-05348 ADM/JSM

v.

Thomas Joseph Petters; Petters Company,
Inc., a/k/a PCI; Petters Group Worldwide, LLC;
Deanna Coleman, a/k/a Deanna Munson;
Robert White;
James Wehmhoff;
Larry Reynolds, and/or dba Nationwide International
Resources, aka NIR;
Michael Catain and/or dba Enchanted
Family Buying Company;
Frank E. Vennes, Jr., and/or dba Metro Gem
Finance, Metro Gem, Inc., Grace Offerings
Of Florida, LLC, Metro Property Financing,
LLC, 38 E. Robinson, LLC, 55 E. Pine, LLC,
Orlando Rental Pool, LLC, 100 Pine Street
Property, LLC, Orange Street Tower, LLC,
Cornerstone Rental Pool, LLC, 2 South
Orange Avenue, LLC, Hope Commons, LLC,
Metro Gold, Inc.,

Defendants.

Douglas A. Kelley,

Receiver,

Gary Hansen,

Receiver.

**MOTION TO APPROVE COORDINATION AGREEMENT AMONG
PLAINTIFF UNITED STATES OF AMERICA, THE RECEIVER, THE
CHAPTER 11 TRUSTEE OF PETTERS COMPANY, INC., ET AL., AND THE
CHAPTER 7 TRUSTEE OF POLAROID CORPORATION, ET AL. N/K/A PBE
CORPORATION, ET AL.**

DOUGLAS A. KELLEY (the “Receiver”), in his capacity as the Court Appointed Receiver in this action, respectfully moves this Court for an Order granting his motion to approve the Coordination Agreement among Plaintiff United States of America, the Receiver, the Chapter 11 Trustee of Petters Company Inc., et al., and the Chapter 7 Trustee of Polaroid Corporation, et al. n/k/a PBE Corporation, et al. (the “Coordination Agreement”) as described in and under the Coordination Agreement.

This Motion is supported by an accompanying Declaration of Daryle L. Uphoff and Memorandum of Law.

DATED: August 18 , 2010

LINDQUIST & VENNUM P.L.L.P.

By /s/ Daryle L. Uphoff
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**ATTORNEYS FOR RECEIVER
DOUGLAS A. KELLEY**