

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
Civil No. 08-5348 (ADM/JSM)

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

1. THOMAS JOSEPH PETTERS;)
PETTERS COMPANY INC.,)
PCI; PETTERS GROUP WORLWIDE, LLC;)
2. DEANNA COLEMAN aka DEANNA MUNSON;)
3. ROBERT WHITE;)
4. JAMES WEHMHOFF;)
5. LARRY REYNOLDS dba)
NATIONWIDE INTERNATIONAL RESOURCES)
aka NIR;)
6. MICHAEL CATAIN dba)
ENCHANTED FAMILY BUYING COMPANY;)
7. FRANK E. VENNES JR. 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,)

**MOTION OF
RECEIVER**

MOTION OF RECEIVER FOR AUTHORIZATION
TO TRANSFER MEMBERSHIP INTEREST
IN WELSH BAKER ROAD, LLC

DOUGLAS A. KELLEY (“Receiver”), in his capacity as the receiver of the assets of Petters Real Estate Group, LLC (“PRG”), respectfully moves this Court for an Order authorizing the transfer by PRG of its fifty percent (50%) membership interest in Welsh Baker Road, LLC for the sum of One Dollar, to RB Broadway Development Company, LLC or its designated affiliate.

This motion is supported by an accompanying affidavit of the Receiver.

DATED: January 29, 2009

LINDQUIST & VENNUM P.L.L.P.

By s/Sandra Smalley-Fleming
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