

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRY REYNOLDS,

Defendant,

DOUGLAS A. KELLEY,

Receiver.

**MOTION TO MODIFY
COURT'S ORDER FROM
DECEMBER 16, 2008,
APPROVING PAYMENTS TO
PRESERVE ASSETS AND
PAYMENTS OF
LIVING EXPENSES**

The Defendant, Larry Reynolds, through his attorney, Frederic Bruno, respectfully moves this Court for a modification of its Order dated December 16, 2008, approving payments to preserve assets and payments of living expenses. Specifically, the following relief is requested:

1. That this Court makes its Order, dated December 16, 2008, approving Defendant's living expenses, retroactive to October 3, 2008, the date of the temporary restraining order freezing the Defendant's assets.
2. Ordering Receiver Kelley to make payments for all arrearages for the approved expenses set forth in the Court's Order, dated December 16, 2008 as well as the arrearages for any additional expenses approved as a result of this motion to modify that Order.

3. Modifying the Court's Order, dated December 16, 2008, by increasing the monthly allowances for the following approved personal expenses:
 - a. Increase the monthly allowance for groceries from \$528 to \$1,000;
 - b. Increase the monthly allowance for health insurance premiums from \$570 to \$780.40, paying two months in advance (i.e. \$1,560.80 every other month);
 - c. Increase the monthly allowance for toiletries to from \$53 to \$150;
 - d. Increase the monthly allowance for miscellaneous expenses from \$250 to \$500;

4. Modifying the Court's Order, dated December 16, 2008, to include monthly allowances for the following additional expenses:
 - a. A monthly allowance of \$120 for Direct TV at the residence in Las Vegas;
 - b. A monthly allowance of \$120 for Direct TV at the residence in Los Angeles;
 - c. A monthly allowance of \$50 for dental care;
 - d. A monthly allowance of \$45 for eye care, glasses and reading glasses;
 - e. A monthly allowance of \$95 for dry cleaning;
 - f. A monthly allowance of \$476 for life insurance premiums;
 - g. A monthly allowance of \$290 for health club dues.

5. Modifying the Court's Order, dated December 16th, 2008, to include a lump sum payment of \$4,000 for the annual health insurance deductible.

6. Ordering Receiver Kelley to pay the following outstanding bills for professional services rendered:
- a. An outstanding bill in the amount of \$465 from Defendant's cardiologist, Dr. Hoffman;
 - b. An outstanding legal bill in the amount of \$24,515.71 for legal counsel rendered to Defendant by Attorney Joe Ryan;
 - c. An outstanding legal bill in the amount of \$7,750.00 for legal counsel rendered to Defendant by Attorney Stephanie Ames; and
 - d. An outstanding bill in the amount of \$700 for accounting services rendered by K.P. Cornwell & Associates.

This motion is based upon the supporting documentation and memorandum of law accompanying this motion, and the files and proceedings herein.

Respectfully Submitted,

Dated: January 29, 2009

s/Frederic Bruno
Frederic Bruno
Attorney License No. 123213
Frederic Bruno & Associates
5500 Wayzata Boulevard, #1450
Minneapolis, MN 55416
Phone: 763-545-7900