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 13 **UNITED STATES DISTRICT COURT**
 14 **CENTRAL DISTRICT OF CALIFORNIA**

15 SECURITIES AND EXCHANGE
 16 COMMISSION,

17 Plaintiff,

18 vs.

19 DIVERSIFIED LENDING GROUP, INC.;
 APPLIED EQUITIES, INC.; and BRUCE
 20 FRIEDMAN,

21 Defendants,

22 and

23 TINA M. PLACOURAKIS,

24 Relief Defendant.

Case No. CV 09-01533-R-(JTLx)

**STIPULATION AND [PROPOSED]
 ORDER RE CONSENT TO
 ISSUANCE OF PRELIMINARY
 INJUNCTION AND OTHER
 RELIEF, AND REQUEST FOR
 LIMITED RELIEF FROM ASSET
 FREEZE**

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1 WHEREAS, defendant Bruce Friedman (“Friedman”) has been served with,
2 inter alia, the summons and complaint filed by the Securities and Exchange
3 Commission (“Commission”); this Court’s March 4, 2009 Temporary Restraining
4 Order and Orders (1) Freezing Assets, (2) Appointing a Temporary Receiver, (3)
5 Prohibiting The Destruction Of Documents, (4) Granting Expedited Discovery, and
6 (5) Requiring Accountings; And To Show Cause Re Preliminary Injunction and
7 Appointment of A Permanent Receiver (“TRO”); and the papers filed by the
8 Commission in support of the issuance of a Preliminary Injunction;

9 WHEREAS, Friedman does not contest the issuance of a preliminary
10 injunction in the form requested by the Commission and consents to all of the
11 relief provided therein (including the confirmation of the temporary receiver as
12 permanent receiver), but wishes to request from the Court limited relief from the
13 asset freeze provisions thereof for reasonable and necessary living expenses;

14 WHEREAS, Friedman has represented through counsel the existence of
15 essential living expenses that are due and payable prior to the time by which a
16 noticed application for relief could be submitted to and heard by this Court;

17 IT IS HEREBY STIPULATED on behalf of the undersigned parties, and the
18 Court is REQUESTED to order that:

19 The [Proposed] Order of Preliminary Injunction And Orders (1) Continuing
20 Asset Freeze, (2) Appointing A Permanent Receiver, (3) Prohibiting The
21 Destruction Of Documents, (4) Granting Expedited Discovery, and (5) Requiring
22 Accountings previously submitted by the Commission be issued by the Court; and
23 that the Court order grant Mr. Friedman limited relief from the asset freeze in the
24 following respect only: allowing Mr. Friedman to make a one-time withdrawal

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1 from his personal Wells Fargo account number XXX-4630-338 in the amount of
2 \$8,800, with such funds to be used solely for the purposes of immediate living
3 expenses, specifically including payment of the mortgage on the residential
4 property in which Mr. Friedman currently is residing. Any further applications for
5 relief from the asset freeze shall be made by noticed motion.

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7 Respectfully submitted,

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9 DATED: March __, 2009

10 _____
11 John M. McCoy III
12 Attorney for Plaintiff
13 Securities and Exchange Commission

14 DATED: March __, 2009

15 _____
16 Richard E. Drooyan
17 Munger, Tolles & Olson LLP
18 Attorney for Defendant
19 Bruce Friedman

20 Good cause appearing, IT IS SO ORDERED

21 **IT IS SO ORDERED.**

22 DATED: March 10, 2009

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25 HONORABLE MANUEL L. REAL
26 UNITED STATES DISTRICT JUDGE
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