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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **SECURITIES AND EXCHANGE**
18 **COMMISSION,**

19 Plaintiff,

20 vs.

21 **DIVERSIFIED LENDING GROUP, INC.;**
22 **APPLIED EQUITIES, INC.;** and **BRUCE**
23 **FRIEDMAN,**

24 Defendants,

25 and

26 **TINA M. PLACOURAKIS,**

27 Relief Defendant.
28

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

STIPULATION AND [PROPOSED]
ORDER RE LIMITED RELIEF
FROM ASSET FREEZE WITH
RESPECT TO RELIEF
DEFENDANT TINA
PLACOURAKIS

1 WHEREAS, relief defendant Tina Placourakis was previously served with,
2 *inter alia*, the Summons and Complaint filed by the Securities and Exchange
3 Commission (“Commission”) and this Court on ’s March 10, 2009 Order of
4 Preliminary Injunction And Orders (1) Continuing Asset Freeze, (2) Appointing A
5 Permanent Receiver, (3) Prohibiting The Destruction Of Documents, (4) Granting
6 Expedited Discovery, and (“Preliminary Injunction”);

7 WHEREAS, Placourakis wishes to request from the Court limited relief
8 from the asset freeze provisions thereof;

9 WHEREAS, Placourakis has made representations and provided information
10 to the Commission and the court-appointed Permanent Receiver regarding her
11 reasonable and necessary living expenses and her contention that the asset freeze,
12 as applied to her, has affected other, arguably exempt income not derived directly
13 or indirectly from any of the defendants in this action;

14 WHEREAS, based upon the information and documentation provided the
15 Commission and the Permanent Receiver do not currently oppose Placourakis’s
16 request;

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

3 The Court order grant Placourakis limited relief from the asset freeze in the
4 following respects: the following bank accounts held in the name of Tina
5 Placourakis, and no others, are hereby exempted from the asset imposed by the
6 Preliminary Injunction:

7 Bank of America account XXXX-0388, and Bank of America account
8 XXXX-3471.

9
10 Respectfully submitted,

11
12 DATED: March 22, 2009

13 
14 John M. McCoy III
15 Attorney for Plaintiff
16 Securities and Exchange Commission

17 DATED: March 20, 2009

18 
19 David A. Gill
20 Court-Appointed Permanent Receiver

21 DATED: March __, 2009

22 Tina Placourakis
23 In Pro Per

24 Good cause appearing, IT IS SO ORDERED

25 IT IS SO ORDERED.

26 DATED: March __, 2009

27 HONORABLE MANUEL L. REAL
28 UNITED STATES DISTRICT JUDGE

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

3 The Court order grant Placourakis limited relief from the asset freeze in the
4 following respects: the following bank accounts held in the name of Tina
5 Placourakis, and no others, are hereby exempted from the asset imposed by the
6 Preliminary Injunction:

7 Bank of America account XXXX-0388, and Bank of America account
8 XXXX-3471.

9
10 Respectfully submitted,

11
12 DATED: March __, 2009

13 _____
14 John M. McCoy III
15 Attorney for Plaintiff
16 Securities and Exchange Commission

17
18 DATED: March __, 2009

19 _____
20 David A. Gill
21 Court-Appointed Permanent Receiver

22
23 DATED: March 20 2009

24 _____
25 Tina Placourakis
26 In Pro Per

27
28 Good cause appearing, IT IS SO ORDERED

IT IS SO ORDERED.

DATED: March __, 2009

HONORABLE MANUEL L. REAL
UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE

1 I am over the age of 18 years and not a party to this action. My business address is:

2
3 U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire
Boulevard, 11th Floor, Los Angeles, California 90036-3648

4 Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

5 On March 23, 2009, I caused to be served the document entitled **STIPULATION**
6 **AND [PROPOSED] ORDER RE LIMITED RELIEF FROM ASSET FREEZE**
7 **WITH RESPECT TO RELIEF DEFENDANT TINA PLACOURAKIS** on all
the parties to this action addressed as stated on the attached service list:

8 **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for
9 collection and mailing today following ordinary business practices. I am
10 readily familiar with this agency's practice for collection and processing of
correspondence for mailing; such correspondence would be deposited with
the U.S. Postal Service on the same day in the ordinary course of business.

11 **PERSONAL DEPOSIT IN MAIL:** By placing in sealed
12 envelope(s), which I personally deposited with the U.S. Postal Service.
Each such envelope was deposited with the U.S. Postal Service at Los
Angeles, California, with first class postage thereon fully prepaid.

13 **EXPRESS U.S. MAIL:** Each such envelope was deposited in a
14 facility regularly maintained at the U.S. Postal Service for receipt of
Express Mail at Los Angeles, California, with Express Mail postage
15 paid.

16 **HAND DELIVERY:** I caused to be hand delivered each such envelope to
the office of the addressee as stated on the attached service list.

17 **FEDERAL EXPRESS:** By placing in sealed envelope(s) designated by
18 Federal Express with delivery fees paid or provided for, which I deposited in
a facility regularly maintained by Federal Express or delivered to a Federal
Express courier, at Los Angeles, California.

19 **ELECTRONIC MAIL:** By transmitting the document by electronic mail
20 to the electronic mail address as stated on the attached service list.

21 **FAX:** By transmitting the document by facsimile transmission. The
22 transmission was reported as complete and without error.

23 **(Federal)** I declare under penalty of perjury that I am a member of the bar of
this Court and that the foregoing is true and correct.

24
25 Date: March 23, 2009

/s/ John M. McCoy III
John M. McCoy III

1 **SEC v. DIVERSIFIED LENDING GROUP, INC., et al.**
2 **United States District Court – Central District of California**
3 **Case No. CV 09-01533 R (JTLx)**
4 **(LA-3591)**

5 SERVICE LIST

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9 Los Angeles, CA 90071-1560
10 Email: richard.drooyan@mto.com

11 Diversified Lending Group, Inc.
12 c/o CT Corporation, Registered Agent
13 818 W. 7th Street
14 Los Angeles, CA 90017

15 Applied Equities, Inc.
16 c/o Karen Burhoe, Registered Agent
17 15260 Ventura Boulevard, Suite 1240
18 Sherman Oaks, CA 91403

19 Tina Placourakis **(also served by electronic mail)**
20 8913 E. Calle de las Brisas
21 Scottsdale, AZ 85255
22 Email: tina@sunwestbottlers.com

23 David A. Gill, Esq. **(also served by electronic mail)**
24 Danning, Gill, Diamond & Kollitz, LLP
25 2029 Century Park East, 3rd Floor
26 Los Angeles, CA 90067-2904
27 Email: dag@dgdk.com
28 ***Court-Appointed Temporary Receiver***

 George E. Schulman, Esq. **(also served by electronic mail)**
 Danning, Gill, Diamond & Kollitz, LLP
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 Email: gschulman@dgdk.com
 Attorney for Court-Appointed Temporary Receiver David A. Gill