FILED
WILLIAMSON COUNTY
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2007 OCT 19 AM 8:05

IN THE CHANCERY COURT FOR WILLIAMSON COUNTY, TENNESSEE
TWENTY-FIRST JUDICIAL DISTRICT AT FRANKLIN

ENTERED

STATE OF TENNESSEE, *ex rel.* ROBERT E. COOPER, JR., ATTORNEY GENERAL and REPORTER,	)	
Plaintiff,	)	**No. 33293**
v.	)	**JURY DEMAND**
ROLAND FROEHLIG a.k.a. Rollie Froehlig, THEODORE HOWES a.k.a. Ted Howes, NATIONAL FULFILLMENT, INC., and ENTERTAINMENT AMERICA, INC.,	)	
Defendants.	)	

MOTION FOR EXPEDITED HEARING

The State of Tennessee, by and through its Attorney General and Reporter, Robert E. Cooper, Jr., moves this Honorable court to set an expedited hearing in this matter given Defendant National Fulfillment has received or will be receiving life insurance proceeds and possibly other assets as a result of Roland Froehlig's death and Defendant National Fulfillment is liquidating. The State only learned of the proposed liquidation on October 17, 2007 and potential life insurance proceeds in the last few weeks.

The State is simultaneously filing its Motion for Appointment of Receiver of Corporate Defendants, Renewed Motion for Asset Freeze, Notice of Suggestion of Death, and Motion to Substitute Parties and Attachments, and the Memorandum in Support, which are incorporated by reference to this Motion.

The State has attached hereto a proposed Order setting the hearings on its Motions on the Appointment of Receiver over Corporate Defendants, Renewed Motion for Asset Freeze, and Motion for Substitution of Parties.

The State submits that exigent circumstances exist concerning the dissipation of the corporate Defendants' assets and that a hearing be set as soon as possible.

The State further moves, that given the exigent circumstances, this pleading and the Order setting the hearing may be served via facsimile on the Defendants' counsel, though the State will provide an original sent via US Mail.

Respectfully submitted,

ROBERT E. COOPER, JR.
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CERTIFICATE OF SERVICE

On October 17, 2007, I, Brant Harrell, do hereby certify that the foregoing document was sent via US Mail and Facsimile where available to the following addresses:

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Brant Harrell

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