

CAUSE NO. D-1-GN-24-001018

SAJID MAQSOOD, TRUSTEE OF THE SAJID	§	IN THE DISTRICT COURT
& JOAN M. MAQSOOD REVOCABLE TRUST,	§	
ET AL.,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	TRAVIS COUNTY, TEXAS
	§	
PRIDE OF AUSTIN HIGH YIELD FUND I, LLC,	§	
ET AL.,	§	
	§	
Defendants.	§	201ST JUDICIAL DISTRICT

RULE 11 AGREEMENT

Gregory S. Milligan, in his capacity as the Court-appointed receiver (“**Receiver**”) for Defendant Pride of Austin High Yield Fund I, LLC (“**POA**” or the “**Fund**”) and Tolia 2013 Revocable Trust & Anish Tolia IRA, John and Judy Arizpe, Richard and Lorena Gardner, Patricia Lloyd Jones, individually and as the Independent Executor of the Estate of James L. Lloyd, deceased, and on behalf of the James L. Lloyd IRA and James L. Lloyd Roth IRA, Jeffrey Walton, Eagle Eye Revocable Trust, David O’Connor, Michael O’Connor, and Graham Wootten (the “**Judgment Holders**”) file this Rule 11 Agreement related to the deadlines to object to the *Receiver’s Other Claims Report*.¹

WHEREAS, on June 17, 2024, the Court entered its *Order Granting Receiver’s Motion to Approve (I) Proposed Claims Verification Procedures; and (II) Claims Bar Date* (the “**Claims Order**”).

WHEREAS, the deadline to file Other Claims (as defined in the Claims Order) was October 15, 2024;

¹ Capitalized terms used in this Rule 11 Agreement and not otherwise defined shall have the meanings ascribed to them in *Receiver’s Other Claims Report* (the “**Claims Report**”).

WHEREAS, each of the Judgment Holders timely filed Other Claims;

WHEREAS, on January 20, 2025, the Receiver filed his Claims Report;

WHEREAS, pursuant to the terms of the Claims Order, the deadline to object to the Claims Report is February 5, 2025 (the “***Objection Deadline***”);

WHEREAS, each of the Judgment Holders may have objections to the Claims Report;

WHEREAS, pursuant to the Claims Order, “the Receiver shall, within a reasonable period of time, file a motion approving the amount and method of distributions to be made to Other Claimants and to Investor Claimants” (the “***Distribution Plan***”);

WHEREAS, in the interest of judicial economies, the Receiver and the Judgment Holders have agreed to extend the Objection Deadline as to the Judgment Holders that have signed this Rule 11 Agreement only;

Accordingly, Receiver and the Membership Judgment Holders agree as follows:

1. The Objection Deadline for the Judgment Holders, and only the Judgment Holders, is extended.
2. Any objections of the Judgment Holders to the Claims Report shall be due at the same time as any objection they may have to the Distribution Plan, which shall be due within 21 days of the date on which the Receiver files the Distribution Plan.

Respectfully submitted and agreed by:

HOLLAND & KNIGHT LLP

By: /s/ Trip Nix

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**ATTORNEYS FOR THE TOLIA 2013
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JOHN AND JUDY ARIZPE, RICHARD AND
LORENA GARDNER, PATRICIA LLOYD
JONES, INDIVIDUALLY AND AS THE
INDEPENDENT EXECUTOR OF THE ESTATE
OF JAMES L. LLOYD, DECEASED, AND ON**

**BEHALF OF THE JAMES L. LLOYD IRA AND
JAMES L. LLOYD ROTH IRA, AND JEFFREY
WALTON**

KELL C. MERCER P.C.

/s/ Kell C. Mercer

Kell C. Mercer

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**ATTORNEY FOR MICHAEL O'CONNOR,
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WOOTTEN**

CERTIFICATE OF SERVICE

I hereby certify that, on February 13, 2025, a true and correct copy of the foregoing motion was served electronically upon all counsel of record via eFileTexas.

/s/ Trip Nix

Trip Nix

Automated Certificate of eService

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Envelope ID: 97337805
Filing Code Description: No Fee Documents
Filing Description: RULE 11 AGREEMENT
Status as of 2/13/2025 11:04 AM CST

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