

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff,

v.

ORAL ARGUMENT
REQUESTED

ARTHUR NADEL,
SCOOP CAPITAL, LLC,
SCOOP MANAGEMENT, INC.,

Defendants,

CASE NO.: 8:09-0087-T-26TBM

SCOOP REAL ESTATE, L.P.,
VALHALLA INVESTMENT PARTNERS, L.P.,
VALHALLA MANAGEMENT, INC.,
VICTORY IRA FUND, LTD.,
VICTORY FUND, LTD.,
VIKING IRA FUND, LLC.,
VIKING FUND, LLC., and
VIKING MANAGEMENT, LLC.

Relief Defendants.

**WELLS FARGO'S MOTION FOR PAYMENT OF CERTAIN
FEES AND COSTS AS ADMINISTRATIVE EXPENSES**

Wells Fargo Bank, N.A. (“Wells Fargo” or “Bank”)¹ moves this Court for an Order compelling the Receiver to reimburse the Bank for specific fees and costs incurred in defense of the Bank’s property rights and security interests, against the claims made and positions taken by the Receiver, as an administrative expense, and states:

¹ Wells Fargo is successor by merger to Wachovia Bank, N.A. (“Wachovia”).