

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GEOFFREY A. HOLLIS, SHARON)
R. HOLLIS, EDMUND J. MANSOR, and)
ROBERTA M. MANSOR)
)
Plaintiffs,)
v.)
)
JPMORGAN CHASE BANK, N.A.)
)
Defendant)

Civil Action No. 1:12-cv-10544-JGD

**PLAINTIFFS' EMERGENCY MOTION TO FILE SUPPLEMENTAL AFFIDAVIT IN
SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

NOW COME the Plaintiffs in the above entitled action and hereby move this Court to permit them on an emergency basis to supplement their Motion to Compel Production of Documents by filing with the Court an Affidavit of their Counsel, Keith L. Miller.

Counsel was in Dallas, Texas last Friday, January 11, 2013, and had meetings with an attorney, Richard Roper ("Receiver"), who by Order of U.S. District Court Judge Reed O'Connor, dated March 25, 2009, on Motion of the United States Securities and Exchange Commission ("SEC"), was appointed Receiver for Millennium Bank and other named Defendants in an action, *SEC v. Millennium Bank et al.*, United States District Court for the Northern District of Texas, Wichita Falls Division, Case No: 7:09-CV-050-O.

The Receiver provided Counsel with electronic files containing thousands of pages of documents obtained by subpoena in the Texas proceeding, including documents produced in response to subpoenas served upon the Defendant in this action. Counsel has only made a

cursory review of the JPMorgan documents, but in that search uncovered two particular documents, which have a direct bearing on the issues presently before the Court on Plaintiff's Motion to Compel Production of Documents.

Plaintiffs therefore move on an emergency basis that the Court permit them to file the attached Affidavit, which has been marked as Exhibit "1", and further asks the Court to consider the same prior to making a ruling on Plaintiffs' Motion to Compel.

WHEREFORE the Plaintiffs request that this Court consider this Motion on an emergency basis, allow the Motion and grant such other relief as it deems just and proper.

Respectfully Submitted,
For the Plaintiffs,
By their attorney

/s/ Keith L. Miller
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by electronic and regular mail to those indicated as non registered participants on January 16, 2013.

/s/ Keith L. Miller
Keith L. Miller