

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

GLOBAL ONLINE DIRECT, INC.,  
BRYANT E. BEHRMANN and LARRY  
"BUCK" E. HUNTER,

Defendants.

Civil Action No. 1:07-CV-0767-WSD

**NOTICE OF MOTION FOR ORDER CLOSING CASE AND DISCHARGING  
THE RECEIVER FOLLOWING COMPLETION OF THE FINAL CLOSING  
TASKS AND FOR OTHER RELATED RELIEF**

PLEASE TAKE NOTICE THAT Michael A. Grassmueck (the "Receiver"), the duly appointed receiver for Global Online Direct, Inc. ("Global") and its subsidiaries Global Online Depository, Global Online SPIP, Global Online Auction Stores, Triple Diamond B, Bodaga Bay, Bodaga Bay Trucking, Inc., Catherine Crick Riders, Double B Broadcasting, Inc., The AM Show, Double B MPG, Global Online Direct, U Loan We Pay, and Bargain Hunter, Inc. and their subsidiaries and affiliates and any entities controlled by them (collectively referred to as the "Receivership Entities"), has moved this Court (the "Motion") for order closing the receivership and discharging the receiver and for other related relief following the completion of the final closing tasks, as set forth in the Motion.

By the Motion, the Receiver requests that the Court authorize the closing of the receivership estate (the "Estate") and the discharge of the Receiver, following: (i) the completion of the distribution of all Estate funds to investors and creditors holding

allowed claims, pursuant to the Order approving the Motion to Approve Distribution and Distribution Plan, (ii) the destruction of Estate records, and (iii) the filing of the Receiver's declaration confirming completion of (i) and (ii) above, and attaching the final accounting for the Estate, (collectively, the "Final Closing Tasks"). The Receiver estimates the completion of the Final Closing Tasks in approximately 120 days from the filing of this Motion. The 120 day period is necessitated by, among other things, the time to complete the distributions, to fully process any returned distribution checks (e.g., those checks returned as undeliverable to investors and creditors), and to incorporate the details concerning the status of distributions into the final accounting.

Once the Final Closing Tasks are completed, the Receiver requests that the Court enter an Order closing the case and discharging the Receiver. Aside from the Final Closing Tasks to be completed, the Receiver has fulfilled all his duties under the Court's Order Appointing a Receiver, Freezing Defendants' Assets, and Ordering Other Ancillary Relief, entered on June 4, 2007, and completed all necessary work pursuant to the Receiver Order.

The Receiver has, among other things, concluded all investigations and accountings of the Receivership Entities and Estate assets, completed the claims administration process in this case, the liquidation of all Estate assets, terminated or otherwise concluded all litigation for claw-back recoveries against third-parties, and obtained approval of a motion for final distribution and distribution plan. With all of the foregoing tasks completed, the Receiver is ready to close this case and request discharge of the Receiver, subject to completion of the Final Closing Tasks, and the entry of the order approving this Motion.

In connection with the Final Closing Tasks, the Receiver requests as additional related relief that the Court approve the destruction of the Estate's records. The Estate believes that destruction of the Estate's records is appropriate and prudent given that many of the records contain personal financial information of individual investors, and other individuals. Destruction of these records ensures that this information cannot be

compromised. Further, with the closing of the receivership, there would be no further need for the Receiver to maintain the records, or incur storage fees and any administrative expenses associated with maintaining such records. The Estate has confirmed with the SEC that these records may be destroyed.

PLEASE TAKE FURTHER NOTICE that copies of the Motion can be viewed at or obtained from the Clerk of the Court, U.S. District Court, Northern District of Georgia, Atlanta Division, 75 Spring Street SW, Room 2211, Atlanta, GA 30303-3361, or by writing to counsel to the Receiver at the below-referenced address.

PLEASE TAKE FURTHER NOTICE that the Motion is set without hearing, unless otherwise ordered by the Court pursuant to Local Rule 7.1(E), and any opposition shall be filed no later than fourteen (14) days after service of the Motion, pursuant to Local Rule 7.1(B). Failure to file an opposition shall indicate that there is no opposition to the Motion pursuant to Local Rule 7.1(B).

Dated: October 1, 2010

Respectfully submitted,

/s/ David R. Zaro, Esq.

---

David R. Zaro, Esq.  
Pro Hac Vice -- CA Bar No. 124334  
[dzaro@allenmatkins.com](mailto:dzaro@allenmatkins.com)  
ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
515 S. Figueroa Street, 7<sup>th</sup> Floor  
Los Angeles, California 90071-3398  
Telephone: 213.622.5555  
Facsimile: 213.620.8816

-and-

/s/ Darryl S. Laddin, Esq.

---

Darryl S. Laddin, Esq.  
Georgia Bar No. 460793  
[darryl.laddin@agg.com](mailto:darryl.laddin@agg.com)  
Frank N. White, Esq.  
Georgia Bar No. 753377  
[frank.white@agg.com](mailto:frank.white@agg.com)  
ARNALL GOLDEN GREGORY LLP  
171 17th Street, NW, Suite 2100  
Atlanta, Georgia 30363  
Telephone: 404.873.8500  
Facsimile: 404.873.8121

Attorneys for Receiver,  
Michael A. Grassmueck