

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE  
 TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY PART III  
 AT NASHVILLE

2017 APR 21 PM 3:38

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STATE OF TENNESSEE, *ex rel.*, )  
 JULIE MIX MCPEAK, Solely in her )  
 official capacity as Commissioner of )  
 Commerce and Insurance, )  
 )  
 Petitioner, )  
 )  
 VS. )  
 )  
 VICKIE L. RINGLEY, individually )  
 and d/b/a/ Hawkins County Memorial Gardens, )  
 )  
 Defendant. )

Case No. 14-1642-III

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**SPECIAL DEPUTY RECEIVER’S MOTION FOR EXTENSION OF TIME TO FILE  
 WRITTEN RECOMMENDATIONS REGARDING CEMETERY**

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Julie Mix McPeak, Commissioner of the Department of Commerce & Insurance, Receiver for Hawkins County Memorial Gardens (hereafter referred to as “HCMG”), through her appointed Special Deputy Receiver, Receivership Management Inc., hereby moves the Court for an Order extending the April 28, 2017 deadline established in the Court’s March 23, 2017 Memorandum and Order for filing written recommendations regarding possible ways to “recover proceeds to fund the Pre-need Services Trusts” of HCMG through the sale of the cemetery. The Special Deputy Receiver requests that the deadline be extended to **May 19, 2017**.

As grounds for this Motion, the Special Deputy Receiver would show the Court the following:

1. As part of the process for formulating the recommendations requested by the Court, the Special Deputy Receiver has instituted a plan of action that includes, *inter alia*, identifying potential purchasers of the cemetery, collecting information regarding those potential purchasers, and communicating with prospective purchasers regarding possible approaches for

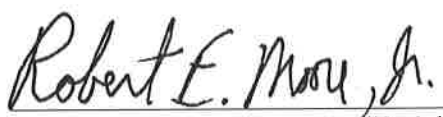
implementing a sale of the cemetery, including those mentioned in Paragraph 2 of the Court's March 23 Order.

2. During the last few weeks following the Court's Status Conference on March 22, 2017 in the present case, the Special Deputy Receiver has dealt with some unexpected personal family matters and work matters that have forced him to be out of the office and out of town on several occasions. The tasks include work performed as the Special Deputy Receiver for the Galilee Memorial Gardens (located in Memphis, Tennessee) receivership case currently pending in the Chancery Court of Davidson County (Case No. 14-102-II). Accordingly, the Special Deputy Receiver has been unable to complete the investigation necessary for formulating his recommendations regarding HCMG.

3. The Special Deputy Receiver submits that a three week extension of the deadline (i.e., extension to May 19, 2017) would give him sufficient time to complete his investigation and file the requested written recommendations with the Court.

**WHEREFORE**, the Special Deputy Receiver requests that this Motion be granted and that the Court enter an Order extending the deadline for filing its written recommendations regarding HCMG to May 19, 2017.

Respectfully submitted:

*with express permission by*  
*Timothy R. Amundson*  
  
Robert E. Moore, Jr. (BPR #013600)  
Chief Operations Officer  
Receivership Management Inc.  
Special Deputy Receiver  
Hawkins County Memorial  
Gardens  
1101 Kermit Drive, Suite 735  
Nashville, TN 37217  
(615) 370-0051 (phone)  
(615) 373-4336 (fax)

NOTICE OF HEARING

A HEARING ON THIS MOTION IS SCHEDULED TO OCCUR ON MAY 5th, 2017 AT 9:00 A.M. IN PART III OF THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE. IF NO RESPONSE TO THIS MOTION IS TIMELY FILED AND PERSONALLY SERVED PURSUANT TO LOCAL RULE § 26.04, THE MOTION MAY BE GRANTED BY THE COURT WITHOUT A HEARING.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served by first-class

U.S. Mail, postage prepaid, upon the following:

Vickie Ringley  
1321 W. Main Street, #16  
Rogersville, TN 37857

Timothy Simonds  
Assistant Attorney General  
Office of the Tennessee Attorney General  
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Michael D. Driver  
Deputy General Counsel, Regulatory Boards Division  
Tennessee Department of Commerce & Insurance  
500 James Robertson Parkway  
Nashville, Tennessee 37243

This 21<sup>ST</sup> day of April, 2017.

*Robert E. Moore Jr. with express permission by Timothy R. Simonds*  
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Robert E. Moore, Jr.