

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON/GREENWOOD DIVISION

IN RE: RECEIVER FOR ) C.A. NO: 8:12-CV-2078-JMC  
RONNIE GENE WILSON AND )  
ATLANTIC BULLION & COIN, INC. )  
)

**RECEIVER’S MOTION TO APPROVE PLAN FOR CLAIMS ADMINISTRATION AND  
DISTRIBUTION OF PROCEEDS**

The Receiver, Beattie B. Ashmore, appointed by this Court pursuant to a June 13, 2012, Order, superseded on July 25, 2012, October 17, 2012, February 14, 2013, January 12, 2015 and October 29, 2015 (collectively “Court Orders”), hereby moves the Court for approval of the Receiver’s proposed Plan for Claims Administration and Distribution of Proceeds attached hereto as Exhibit A (the “Plan”).

For purposes of the Receiver’s Motion to Approve Plan for Claims Administration and Distribution of Proceeds (“Motion”), the Schedule of Net Loss Amounts and Objection Form referenced in the Receiver’s proposed Plan are NOT attached, and will be published only if the Court grants the Receiver’s Motion and adopts the Plan. Additionally, if the Court adopts the Plan, the blanks set forth in the Plan will be filled in with relevant dates. If approved, all claimants who submitted a Proof of Claim form and all known and potential creditors will receive notice of the adopted Plan (including dates), Schedule of Net Loss Amounts and Objection Form via United States Mail.<sup>1</sup>

The purpose of the Receiver’s Motion is to notify all claimants who submitted a Proof

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<sup>1</sup> In addition, the adopted Plan will be posted on the Receiver’s website.

of Claim form, as well as all known and potential creditors, that the Receiver is asking the Court to approve the proposed Plan as written. Per the Court Order of October 22, 2015 (ECF 161), if any such person has any objection to the validity or substance of the Plan as a whole, then they must notify the Court in writing by December 4, 2015.<sup>2</sup> A hearing will be held by the Court on December 17, 2015 to hear and rule upon any timely submitted objections. If the Plan is approved by the Court, the Plan will set forth the procedure to submit objections relevant to a claimant's individual claim.

As such, the Receiver hereby moves the Court to adopt the proposed Plan attached hereto as Exhibit A.

I SO MOVE.

Respectfully submitted,

***THE TOLLISON LAW FIRM, P.A.***

/s/L. Walter Tollison, III

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**Attorneys for the Receiver**

November 6, 2015  
Greenville, South Carolina

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<sup>2</sup> All written objections must be submitted to the Office of the Clerk of Court, Clement F. Haynsworth Federal Courthouse, 300 East Washington Street, Greenville, South Carolina 29601.