

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

RECEIVED  
CLERK, GREENVILLE, SC  
2013 AUG 21 A 10 50

UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

Movant.

CASE NO. 8:12-cv-02078-JMC

**MOTION FOR DEFAULT JUDGMENT**

IN RE: RECEIVER FOR RONNIE GENE  
WILSON AND ATLANTIC BULLION &  
COIN, INC.

GORDON L HALL

Petitioner,

and

UNITED STATES OF AMERICA

Respondent.

**[Filed concurrently with an AFFIDAVIT  
OF SPECIFIC NEGATIVE AVERMENT  
IN SUPPORT OF MOTION FOR  
DEFAULT JUDGMENT]**

The Petitioner/Movant, GORDON L HALL, by and through the undersigned, and pursuant to FRCP Rule 55, hereby moves that the court enter a default judgment in the above-captioned matter against the Plaintiff/Respondent, UNITED STATES OF AMERICA, and further moves:

- 1) That the Court issue an order directing the UNITED STATES OF AMERICA to show cause, if any, why the UNITED STATES OF AMERICA should not be compelled to comply with the FINAL EXPRESSION OF AGREEMENT IN A RECORD (ECF #57) served upon the UNITED STATES OF AMERICA with respect to the Tender (ECF#55);

- 2) That the Court enforce the FINAL EXPRESSION OF AGREEMENT IN A RECORD issued to the UNITED STATES OF AMERICA, require complete compliance with the FINAL EXPRESSION OF AGREEMENT IN A RECORD, direct the UNITED STATES OF AMERICA to obey the FINAL EXPRESSION OF AGREEMENT IN A RECORD served upon the UNITED STATES OF AMERICA, and order the UNITED STATES OF AMERICA's attendance and testimony and the production of the dismissal of the Petitioner/Movant, GORDON L HALL, in Civil Case #: 8:12-cv-02078-JMC, Criminal Case #: 6:13-cr-00170-JMC-1, and including but not limited to all derivative actions derived from said Civil Case, release all assets seized from the UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION other than the assets pursuant to said FINAL EXPRESSION OF AGREEMENT IN A RECORD required by the terms of the Tender and FINAL EXPRESSION OF AGREEMENT IN A RECORD before the Petitioner/Movant, GORDON L HALL, or Gordon LeRoy Hall, Private Unenfranchised Individual, and to release the Petitioner/Movant, GORDON L HALL, from confinement, at such time as may be fixed by the Court;
- 3) That the Court enter a final judgment and enforcement order; and
- 4) That the Court grant such other and further relief as is just and proper.

Respectfully submitted this 19<sup>th</sup> day of August, 2013.

GORDON L HALL  
Petitioner/Movant

By: 

\_\_\_\_\_  
Gordon LeRoy Hall  
Private Unenfranchised Individual

**AFFIDAVIT OF SPECIFIC NEGATIVE AVERMENT  
IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT**

The Affiant, Gordon LeRoy Hall, hereinafter, "Affiant," does solemnly affirm, declare and state as follows:

1. Affiant is competent to state the matters set forth herein;
2. Affiant has knowledge of the facts stated herein;
3. All the facts herein stated are true, correct and complete, admissible as evidence. If called upon as a witness, Affiant will testify to their veracity;
4. There is no evidence that Affiant is not a friend of THIS COURT, and Affiant believes none exists;
5. There is no evidence that the Petitioner/Movant, GORDON L HALL, by and through the undersigned, and pursuant to FRCP Rule 55, does not hereby move that the court enter a default judgment in the above-captioned matter against the Plaintiff/Respondent, UNITED STATES OF AMERICA, and does not further move:
  - 1) That the Court issue an order directing the UNITED STATES OF AMERICA to show cause, if any, why the UNITED STATES OF AMERICA should not be compelled to comply with the FINAL EXPRESSION OF AGREEMENT IN A RECORD (ECF #57) served upon the UNITED STATES OF AMERICA with respect to the Tender (ECF#55);
  - 2) That the Court enforce the FINAL EXPRESSION OF AGREEMENT IN A RECORD issued to the UNITED STATES OF AMERICA, require complete compliance with the FINAL EXPRESSION OF AGREEMENT IN A RECORD, direct the UNITED STATES OF AMERICA to obey the FINAL EXPRESSION OF

AGREEMENT IN A RECORD served upon the UNITED STATES OF AMERICA, and order the UNITED STATES OF AMERICA's attendance and testimony and the production of the dismissal of the Petitioner/Movant, GORDON L HALL, in Civil Case #: 8:12-cv-02078-JMC, Criminal Case #: 6:13-cr-00170-JMC-1, and including but not limited to all derivative actions derived from said Civil Case, release all assets seized from the UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION other than the assets pursuant to said FINAL EXPRESSION OF AGREEMENT IN A RECORD required by the terms of the Tender and FINAL EXPRESSION OF AGREEMENT IN A RECORD before the Petitioner/Movant, GORDON L HALL, or Gordon LeRoy Hall, Private Unenfranchised Individual, and to release the Petitioner/Movant, GORDON L HALL, from confinement, at such time as may be fixed by the Court;

- 3) That the Court enter a final judgment and enforcement order; and
- 4) That the Court grant such other and further relief as is just and proper.

and Affiant believes none exists.

Maricopa County	)	<b>Commercial Affirmation and Verification</b>
Arizona Republic	)	affirmed and subscribed:
United States of America	)	

I, Gordon LeRoy Hall, Secured Party Creditor, under my unlimited liability and Commercial Affirmation, proceeding in good faith, being of sound mind, having first-hand knowledge, affirm, state, and declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed within the Republic for the United States of America in Maricopa County, Arizona Republic, this nineteenth day of the eighth month in the year of our Lord, two thousand thirteen.

In Witness Whereof, I have hereunto set my hand and seal.

  
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 Gordon LeRoy Hall