

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**J. ROBERT DOBBINS, DOBBINS CAPITAL
CORP., DOBBINS OFFSHORE CAPITAL,
LLC, DOBBINS PARTNERS, L.P., and
DOBBINS OFFSHORE, LTD.,**

Defendants,

Tracey Dobbins,

Relief Defendant.

**Civil Action No.
3:04-CV-0605-D**

**SECURITIES AND EXCHANGE COMMISSION'S MOTION TO APPROVE A
DISTRIBUTION PLAN AND APPOINT A DISTRIBUTION AGENT**

Plaintiff Securities and Exchange Commission (the "SEC") seeks to distribute approximately \$137,000 in assets recently collected in this matter (the "Distribution Fund") to injured investors previously identified by the Court-appointed receiver (the "Receiver"), using the Court-approved methodology underlying the Receiver's prior distributions. Upon notification by the SEC of the expiration of the thirty (30) day notice period described in the Investor Notice attached to the accompanying Rule 7.1 Certification (the "Investor Notice"), the SEC respectfully requests that the Court enter the accompanying proposed order approving the proposed distribution plan (the "Plan") and appointing the undersigned, an SEC employee, as Distribution Agent.

Concurrent with the filing of this motion, the SEC has sent the Investor Notice to the last known address of the persons and entities included in prior distributions, listed on Exhibit A to the Investor Notice. The Notice provides directions on how to object to the Plan and provides a final chance to those injured investors for whom the SEC has not obtained current contact information (Exhibit B to the Investor Notice), to provide current contact information to the undersigned.

WHEREFORE, upon notification by the SEC of the expiration of the thirty (30) day notice period described in the Investor Notice, the SEC respectfully requests that this Court enter the accompanying proposed Order and grant such other relief as the Court deems just and proper.

Dated: November 30, 2017

Respectfully submitted,

s/Catherine E. Pappas

Catherine E. Pappas

PA Bar No. 56544

Securities and Exchange Commission

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