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Attorneys for Johnathan O. Hafen as Receiver for the Rust Rare Coin Receivership

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

COMMODITY FUTURES TRADING
COMMISSION, and

STATE OF UTAH DIVISION OF
SECURITIES, through Attorney General
Sean D. Reyes

Plaintiffs,
v.

RUST RARE COIN INC., a Utah corporation,
and GAYLEN DEAN RUST, an individual,
DENISE GUNDERSON RUST, an individual,
and JOSHUA DANIEL RUST, an individual,

Defendants;

and

ALEESHA RUST FRANKLIN, an individual,
R LEGACY RACING INC, a Utah
corporation, R LEGACY ENTERTAINMENT
LLC, a Utah limited liability company, and R
LEGACY INVESTMENTS LLC, a Utah
limited liability company.

Relief Defendants.

MOTION FOR ADDITIONAL TIME

Civil No. 2:18-cv-00892-TC-DBP

Judge Tena Campbell
Magistrate Judge Dustin Pead

Jonathan O. Hafen, as Court-Appointed Receiver (the “Receiver”) for the assets of Rust Rare Coin, Inc. (“RRC”), Gaylen D. Rust, Denise G. Rust, and Joshua D. Rust (collectively with RRC, “Defendants”), as well as R Legacy Racing Inc., R Legacy Entertainment LLC, and R Legacy Investments LLC (collectively, “Relief Defendants” and, collectively with Defendants, “Receivership Defendants”), respectfully submits this Motion for Additional Time (this “Motion”).

RELIEF REQUESTED AND GROUNDS

Through this Motion, the Receiver requests additional time to investigate the proposed settlement agreement with Lynn and Darlene Goodsell (the “Goodsells”). After submitting his Motion to Approve Receiver’s Settlement Agreement with Lynn and Darlene Goodsell, ECF No. 452, the Receiver obtained additional information related to the Goodsells’ assets, which potentially calls into question the agreed-upon settlement amount. The Receiver respectfully requests that the Court refrain from consideration of the proposed settlement until the Receiver has the opportunity to investigate this new information. Once the Receiver has had the opportunity to investigate, he will update the Court.

DATED this 3rd day of May, 2022.

PARR BROWN GEE & LOVELESS, P.C.

/s/ Cynthia D. Love

Joseph M.R. Covey

Cynthia D. Love

Attorneys for the Receiver

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **MOTION FOR ADDITIONAL TIME** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on May 3, 2022, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver's website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver's master mailing matrix.

/s/ Cynthia D. Love
