

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

IN RE RECEIVER FOR SCOTT A.KOHN AND	)	C.A. 6:19-cv-01112-BHH
FUTURE INCOME PAYMENTS, LLC, JOSEPH	)	
P. HIP,P KRAIG S. AIKEN, DAVID N.	)	
KENNEALLY, and MELANIE JO SCHULZE-	)	
MILLER	)	

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

The Receiver, Beattie B. Ashmore, appointed by this Court pursuant to an Order of Appointment amended most recently on October 9, 2020, 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, only 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.¹

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

¹ In addition, if approved, 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. 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 writing² by December 15, 2025 with a hearing to be held by the Court on January 22, 2026 at 11:00 AM in Courtroom No. 2 of the J. Waties Waring Judicial Center, 83 Meeting Street, South Carolina 29401 as set forth in the Court's Order attached hereto. 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.

Again, as set forth in the Court's Order, the Court has set the following two critical dates:

* December 15, 2025 as the deadline for filing with the Court a written response to the Receiver's Motion setting forth any objections to the Plan, and

* January 22, 2026 at 11:00 AM the Court will hear the Motion to Approve the Plan and objections, if any.

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

I SO MOVE.

[Signatures on following page]

² Office of the Clerk of Court, United States District Court, 85 Broad Street, Charleston, SC 29401.

Respectfully submitted,

THE TOLLISON LAW FIRM, P.A.

/s/L. Walter Tollison, III

L. Walter Tollison, III (Fed. Bar No. 4117)

Walt.tollison@thetollisonlawfirm.com

/s/Lauren S. Price

Lauren S. Price (Fed. Bar No. 10406)

Lauren.price@thetollisonlawfirm.com

18-B S. Markley Street

Greenville, South Carolina 29601

Phone: (864) 451-7038 / Fax: (864) 451-7591

Attorneys for the Receiver

October 15, 2025

Greenville, South Carolina