

BROWN & CONNERY, LLP
By: Warren W. Faulk, Esquire
360 Haddon Avenue
P.O. Box 539
Westmont, New Jersey 08108
856-854-8900
Attorneys for Sterling (Anguilla) Trust, Ltd.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**Commodity Futures Trading
Commission**

Plaintiff,

vs.

**Equity Financial Group LLC,
Tech Traders, Inc.,
Vincent J. Firth, and
Robert W. Shimer,**

Defendants.

CIVIL ACTION NO. 04-cv-1512 (RBK-AMD)

**NOTICE OF MOTION
TO INTERVENE**

TO: Elizabeth M. Streit, Esq.
Scott R. Williamson, Deputy Regional Counsel
Rosemary Hollinger, Regional Counsel
Commodity Futures Trading Commission
525 West Monroe Street, Suite 1100
Chicago, Illinois 60661

Paul Blaine, Esq.
Assistant United States Attorney
For the District of New Jersey
Camden Federal Building & U.S. Courthouse
401 Market Street, 4th Floor
Camden, New Jersey 08102-1568

Lewis B. Cohn, Esq.
Witman Stadtmauer Michaels, P.A.
Counsel for Equity Financial Group LLC
26 Columbia Turnpike
Florham Park, New Jersey 07932-2246

Cirino M. Bruno, Esq.
Gusrae Kaplan & Bruno
Counsel for Tech Traders, Inc.
120 Wall Street
New York, New York 10005

J. Vernon Abernethy
413 South Chester Street
Gastonia, NC 28052

PLEASE TAKE NOTICE that on Friday, October 15, 2004 at 9:30 a.m. or soon thereafter as counsel may be heard, the undersigned attorneys for Sterling (Anquilla) Trust, Ltd., shall apply to the Hon. Robert B. Kugler, J.U.S.D.C. at the Mitchell H. Cohen Court House, Camden, New Jersey, for an Order pursuant Fed. R. Civ. P. 24 permitting Sterling (Anquilla) Trust, Ltd. to intervene in this matter for the limited purpose of moving for partial relief from the August 24, 2004 preliminary injunction permitting the Receiver to hold \$1.925 million of Sterling (Anquilla) Trust's funds.

In support thereof, counsel for the movant shall rely on the within Declaration of Warren W. Faulk, Esq., and the enclosed Memorandum in Support of Motion to Intervene. A form of proposed Order is also enclosed.

PLEASE TAKE FURTHER NOTICE that Movant request oral argument.

BROWN & CONNERY, LLP
Attorneys for Movant
Sterling (Anquilla) Trust, Ltd.

Dated: September 22, 2004

By: /s Warren W. Faulk
Warren W. Faulk