Matthew H. Adler (MA-4720) Jeffrey A. Carr (JC-1130) Pepper Hamilton LLP (A Pennsylvania Limited Liability Partnership) 300 Alexander Park Princeton, NJ 08543-5276 (609) 452-0808

Counsel for Stephen T. Bobo, Temporary Equity Receiver

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

COMMODITY FUTURES TRADING COMMISSION,	
Plaintiff,) No.: 04-cv-1512 (RBK))
VS.)
EQUITY FINANCIAL GROUP, LLC, TECH TRADERS, INC., VINCENT J. FIRTH, and ROBERT W. SHIMER,) NOTICE OF MOTION)
Defendants.) Hearing Date: August 23, 2004

TO: <u>SEE</u> ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on August 23, 2004, or as soon thereafter counsel may be heard, Stephen T. Bobo, Temporary Equity Receiver, through his undersigned counsel, shall move before the United States District Court for the District of New Jersey for an Order granting Interim Compensation and Expense Reimbursement to Sachnoff & Weaver, Ltd., Pepper Hamilton LLP, FGMK, LLC and Phoenix Management Services, Inc.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Stephen

T. Bobo, Temporary Equity Receiver, shall rely on the enclosed Application of Temporary Equity Receiver and Sachnoff & Weaver, Ltd. for Interim Compensation and Expense Reimbursement, Application of Pepper Hamilton LLP for Interim Compensation and Expense Reimbursement, Application of FGMK, LLC for Interim Compensation and Expense Reimbursement, Application of Phoenix Management Services, Inc. for Interim Compensation and Expense Reimbursement and Declaration of Stephen T. Bobo (with attached Exhibits).

PLEASE TAKE FURTHER NOTICE that oral argument is hereby requested in the event that this Motion is opposed.

A proposed form of Order is submitted for the Court's convenience.

Respectfully submitted,

/s/ Jeffrey A. Carr Matthew H. Adler (MA-4720) Jeffrey A. Carr (JC-1103) Pepper Hamilton LLP (A Pennsylvania Limited Liability Partnership) 300 Alexander Park Princeton, NJ 08543-5276 (609) 452-0808

and

Pro Hac Vice Counsel:
Bina Sanghavi
Raven Moore
Sachnoff & Weaver, Ltd.
30 South Wacker Drive, Suite 2900
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(312) 207-1000

Counsel for Stephen T. Bobo, Temporary Equity Receiver

Dated: July 15, 2004

CERTIFICATE OF SERVICE

I, Jeffrey A. Carr, hereby certify that I caused copies of the foregoing Notice of the Motion and the Application of Temporary Equity Receiver and Sachnoff & Weaver, Ltd. for Interim Compensation and Expense Reimbursement, Application of Pepper Hamilton LLP for Interim Compensation and Expense Reimbursement, Application of FGMK, LLC for Interim Compensation and Expense Reimbursement, Application of Phoenix Management Services, Inc. for Interim Compensation and Expense Reimbursement and Declaration of Stephen T. Bobo (with attached Exhibits), to be served upon:

Elizabeth M. Streit, Lead Trial Attorney Scott R. Williamson, Deputy Regional Counsel Rosemary Hollinger, Regional Counsel Commodity Futures Trading Commission 525 West Monroe Street, Suite 1100 Chicago, IL 60661 Fax: (312) 596-0537

Samuel F. Abernethy Menaker & Herrmann LLP 10 East 40th Street New York, NY 10016-0301 Fax: (212) 545-1656 Paul Blaine Assistant United States Attorney for the District of New Jersey Camden Federal Building & U.S. Courthouse 401 Market Street, 4th Floor Camden, NJ 08101 Fax: (856) 757-5412

Melvyn J. Falis Gusrae, Kaplan & Bruno PLLC 120 Wall Street New York, NY 10005 Fax: (212) 809-5449

by facsimile transmission and regular mail on this 15th day of July, 2004.

/s/ Jeffrey A. Carr

Jeffrey A. Carr