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. EIRTH and BODERT W. SHIMER |) NOTICE OF MOTION |
| FIRTH, and ROBERT W. SHIMER, Defendants. |) Hearing Date: November 4, 2005 |

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

PLEASE TAKE NOTICE that on November 4, 2005, 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 and FGMK, LLC.

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

T. Bobo, Temporary Equity Receiver, shall rely on the enclosed Fifth Application of Equity Receiver and Sachnoff & Weaver, Ltd. for Interim Compensation and Expense Reimbursement, Fifth Application of Pepper Hamilton LLP for Interim Compensation and Expense

Reimbursement, Fifth Application of FGMK, LLC for Interim Compensation and Expense

Reimbursement and Declaration of Stephen T. Bobo as Equity Receiver in Support of Fifth

Applications for Interim Compensation and Reimbursement (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
Chicago, IL 60606
(312) 207-1000

Counsel for Stephen T. Bobo, Temporary Equity Receiver

Dated: October 5, 2005

SERVICE LIST

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, Illinois 60661

Samuel F. Abernethy Paul M. Hellegers Menaker & Herrmann LLP 10 East 40th Street New York, New York 10016

J. Vernon Abernethy 413 South Chester Street Gastonia, North Carolina 28052

Vincent J. Firth 3 Aster Court Medford, New Jersey 08055 Paul Blaine Assistant United States Attorney for the District of New Jersey Camden Federal Building & U.S. Courthouse 401 Market Street, 4th Floor Camden, New Jersey 08101

Melvyn J. Falis Gusrae, Kaplan & Bruno PLLC 120 Wall Street New York, New York 10005

Robert Shimer 1225 W. Leesport Rd. Leesport, PA 19533