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 Equity Receiver

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

)
) No.: 04-cv-1512 (RBK)
)
)
)
) NOTICE OF MOTION FOR ENTRY
OF TURNOVER ORDER DIRECTED
) AT MCDERMOTT WILL & EMERY
)
)
) Hearing Date: December 16, 2005
)
)
)
)

## TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on December 16, 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 entry of a turnover Order directed at McDermott Will & Emery.

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

T. Bobo, Temporary Equity Receiver, shall rely on the enclosed Brief and Affidavit (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

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and

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Counsel for Stephen T. Bobo, Temporary Equity Receiver

Dated: November 15, 2005

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