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

COMMODITY FUTURES TRADING )  
COMMISSION, )

Plaintiff, )

vs. )

EQUITY FINANCIAL GROUP, LLC, )  
TECH TRADERS, INC., TECH )  
TRADERS, LTD., MAGNUM )  
INVESTMENTS, LTD., MAGNUM )  
CAPITAL INVESTMENTS, LTD., )  
VINCENT J. FIRTH, ROBERT W. )  
SHIMER, COYT E. MURRAY, and J. )  
VERNON ABERNETHY, )

Defendants. )

No.: 04-cv-1512 (RBK)

**NOTICE OF MOTION TO  
DISALLOW CERTAIN UNIVERSE  
INVESTOR CLAIMS BASED UPON  
REPAYMENTS FROM KAIVALYA  
HOLDINGS GROUP, INC.**

Hearing Date: February 16, 2007

TO: SEE ATTACHED SERVICE LIST

**PLEASE TAKE NOTICE** that on February 16, 2007, or as soon thereafter as counsel may be heard, Stephen T. Bobo, Temporary Equity Receiver, through his undersigned attorneys, shall move before the United States District Court for the District of New Jersey for entry of an Order Disallowing Certain Universe Investor Claims Based Upon Repayments From Kaivalya Holdings Group, Inc.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion the Temporary Equity Receiver, shall rely upon the enclosed Memorandum and Affidavit of Stephen T. Bobo in Support of to Disallow Certain Universe Investor Claims Based Upon Repayments From Kaivalya Holdings Group, Inc (with attachments).

**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,

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Dated: January 19, 2007

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