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

Counsel for Stephen T. Bobo, 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: September 15, 2006

## TO: **SEE** ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on September 15, 2006, or as soon thereafter counsel may be heard, Stephen T. Bobo, Equity Receiver, through his undersigned counsel, shall move before the United States District Court for the District of New Jersey for an Order for authority to implement creditor claim process for non-investor creditors of Tech Traders, Inc., Tech Traders, Ltd., and Equity Financial Group, LLC, and related relief.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Stephen T. Bobo, Temporary Equity Receiver, shall rely on the enclosed Affidavit and Memorandum (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, Equity Receiver

Dated: August 22, 2006

## **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 100 Glenway Street #K Belmont, North Carolina 28012

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, 4<sup>th</sup> 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