

Mar 11 2005

CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO
Magistrate Judge Garber

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP.,
JOEL STEINGER a/k/a JOEL STEINER,
LESLIE STEINGER a/k/a LESLIE STEINER,
and PETER LOMBARDI,

Defendants,

VIATICAL BENEFACTORS, LLC,
VIATICAL SERVICES, INC.,
KENSINGTON MANAGEMENT, INC.,
RAINY CONSULTING CORP.
TWIN GROVES INVESTMENTS, INC.,
P.J.L. CONSULTING, INC.,
SKS CONSULTING, INC., and
CAMDEN CONSULTING, INC.,

Relief Defendants.

**KOZYAK TROPIN & THROCKMORTON, P.A.'S THIRD
REQUEST FOR INTERIM COMPENSATION TO PAY ATTORNEYS'
FEEES AND COSTS AND MEMORANDUM IN SUPPORT**

(October 1, 2004 - January 31, 2005)

**Pursuant to Court Order, all objections to this Third
Application must be filed and served within ten (10) days of
this Third Application.**

David P. Milian, a Shareholder of Kozyak Tropin & Throckmorton, P.A. ("KTT") submits this Third Application for an award of interim attorney's fees and costs incurred by KTT as counsel to the Receiver, Roberto Martínez (the "Receiver") for the period October 1, 2004 through January 31, 2005 (the "Application Period").¹

KTT submits this Third Application at the request of the Receiver. This reflects KTT's agreement to reduce its fees by \$17,306.95 based on the reduction of KTT's billing rates from the firm's normal hourly rates (which reductions were reflected in the original fee application). This reduction is without prejudice to KTT making a future application to recover the reduction based on results obtained and the success of the Receivership.

In support of this Third Application, the undersigned submits the following:

1. Attached as **Exhibit "1"** is a Summary of the Fees incurred by KTT in its representation of the Receiver for the Application Period. Costs are posted through January 31, 2005.

2. Attached as **Exhibit "2"** is a summary of all KTT timekeepers, their billing rates and the total hours that were charged by each timekeeper. **Exhibit "3"** is a summary of each timekeeper broken down by category. All time has been billed at the reduced agreed upon rate.² All partners other than Detra Shaw-Wilder are billed at \$350.00/hour. Ms. Shaw-Wilder is billed at her

¹There are a few time entries pre-October 1, 2004 that were inadvertently omitted from the Second Application filed December 7, 2004. KTT has included these time entries in this Third Application.

²KTT maintains detailed time records that are kept contemporaneously with the services performed. KTT will file, within 10 days, these detailed time records under seal with the Court for review *in camera* and ex-parte.

current hourly rate of \$310.00. All non-partner timekeepers are billed at 15% below their regular hourly billing rate. As set forth above, savings to the receivership reflected in these negotiated discounts for this time period is approximately \$17,306.95. In certain instances, time billed to one category could have been appropriately billed to a different category or several different categories, however, in some instances it was very difficult, if not impossible, to divide the time between categories.

3. Attached as **Exhibit "4"** is the summary of costs. Total costs for which KTT seeks reimbursement are \$8,224.12. This reflects a voluntary write-off of out-of-pocket costs advanced by KTT of \$293.46.

4. The services rendered in each major category can be summarized as follows:

a. Asset Analysis and Recovery. [**\$3,417.50**]. Time included in this category reflects the efforts of KTT professionals to continue to identify and locate assets and maintain the status quo. KTT professionals continued the identification, review and analysis of pertinent documents and law, and, where appropriate, issued demand letters for return of funds or assets. However, based on the Receiver's instructions, to minimize costs, KTT stopped its major efforts in this area.

b. Asset Disposition. [**\$105.00**]. Minimal time was charged in this category. KTT, as well as other Receiver professionals, continue to receive inquiries regarding the disposition of assets.

c. Business Operations. [**\$57,880.25**]. The efforts of KTT personnel in this area focused on the continued assistance in the management of the operations of the Receivership

Entities, meeting with banks, resolving account issues, working on IRA issues, and, most significantly, continuing to assure the uninterrupted payment of premiums for the policies.

KTT timekeepers worked on every aspect of business operations and operational logistics at MBC and VSI, including interface with, and coordination of, employees, bonding issues, continued banking issues, collection of death benefits, dealing with IRA transfer and rollover issues, interfacing with insurance companies on a variety of issues and reviewing payment of administrative expenses. At the Receiver's request, KTT attorney Carmen Contreras-Martinez has been on site at MBC at least two days a week and has been available "on call" to MBC personnel every day.

d. Claims Administration and Objections. [\$123.40]. Minimal time was charged in this category.

e. Investor and Agent Communications. [\$5,335.50]. KTT continues to assist the Receiver with investor communications, including preparing responses to investor inquiries, assisting the Receiver in preparing form responses for Garden City, speaking to investors or their counsel, and assisting with the preparation or editing of material to be included on the website.

f. Case Administration. [\$4,969.80]. Time billed to this category includes the efforts associated with the administration of the Receivership including leasing, case staffing and general database issues, as well as preparing, or assisting in the preparation of, motions to modify the Receiver's authority as necessary and appropriate. Time in this category also includes the actual website construction and maintenance which work is done by KTT paraprofessionals.

g. Employee Matters. [**\$2,372.00**]. KTT professionals have assisted the Receiver as requested in addressing the appropriate treatment of employees under the circumstances of the Receivership, including matters relating to continuation or termination of benefits.

h. Fee/Employment Applications (Professionals). [**\$4,021.80**]. Time in this category includes preparation of KTT's Second Interim Application.

i. General Litigation. [**\$2,155.25**]. To the extent possible, KTT has divided litigation efforts into specific categories as illustrated below. However, some litigation efforts relate to all litigation including set up for discovery responses, which time is generally included here.

j. Litigation SEC. [**\$24,462.30**]. All time associated directly to the pending SEC litigation is included in this category including review of pleadings, assisting in preparation of receiver reports and attendance at hearings when requested by the Receiver.

k. Litigation Third-Party. [**\$1,487.25**]. Timekeepers at KTT have assisted the Receiver and co-counsel at Colson Hicks Eidson in coordinating outside litigation, including analysis and review of third party interpleader actions, and intervention requests.

l. Litigation - Administrative. [**\$1,328.50**]. KTT timekeepers have assisted, as requested, in efforts to abate regulatory actions during the Receivership, as well as assist in responding to requests for information from administrative agencies.

5. For the Application Period, KTT seeks reimbursement for 470.40 hours of attorney and paraprofessional time. The total amount of fees sought during the application period is **\$103,976.05**, reflecting the negotiated discounts totaling approximately \$17,306.95 and courtesy

discount as reflected on Exhibit 2 totaling \$3,682.50. Total expenses sought by KTT for the application period are **\$8,224.12**.

6. I have carefully reviewed the attached exhibits and I am responsible for supervising all of the attorneys in my firm on the case. I certify that the hours expended and the costs incurred were necessary and reasonable to represent the Receiver during the Application Period.

MEMORANDUM OF LAW

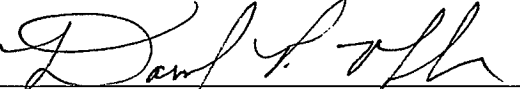
When determining the award of attorneys' fees, the Court should give consideration to the factors for compensation that the 11th Circuit articulated in *In re Norman v. Housing Authority of City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988) - (1) the time and labor properly employed by the attorneys in processing the case; (2) the quality of services rendered; (3) the scope of the activity and conspiracy under attack; (4) the financial risk involved; (5) the magnitude, complexity and novelty of the issues involved; (6) the beneficial results obtained; and (6) the degree to which, if any, effort were supported by prior governmental action. KTT respectfully suggests that its application meets all of the criteria for this interim request for compensation. The Receiver, with the assistance of KTT, has stabilized operations, secured assets, and, to the extent possible, maintained the status quo, while communicating regularly with all parties in interest, especially investors.

WHEREFORE, KOZYAK, TROPIN & THROCKMORTON, by and through the undersigned counsel, respectfully requests that this Court enter an Order Authorizing the Payment of **\$103,976.05** in fees and reimbursement of **\$8,224.12** in costs for the Application Period. A proposed form of Order is attached.

Dated: March 11th, 2005

Respectfully submitted,

KOZYAK TROPIN & THROCKMORTON, P.A.
Co- Counsel for the Receiver – Robert Martinez
2525 Ponce de Leon, 9th Floor
Coral Gables, Florida 33134
Tel. (305) 372-1800/Fax. (305) 372-2508
E-mail: counselmbc@kttlaw.com

By: 
David P. Milian, FL Bar No. 844421
Laurel M. Isicoff, FL Bar No. 350923
Carmen Contreras-Martinez, FL Bar No. 0093475

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served via electronic mail and U.S. Mail this 11th day of March, 2005 to all parties on the attached Service List.

By: 
David P. Milian

3298/101/249563.1

SERVICE LIST OF RECEIVER

December 10, 2004

Case No.: 04-60573 CIV-Moreno

Bruce A. Zimet Esq.
BRUCE A. ZIMET, PA
100 S.E.3rd Avenue, Suite 2612
Ft. Lauderdale, FL 33394
Attorneys for Leslie Steinger
Tel: (954) 764-7081
Fax: (954) 760-4421

Faith E. Gay, Esq.
White & Case LLP
4900 Wachovia Financial Center
200 So. Biscayne Blvd.
Miami, FL 33131-2352
Tel: (305) 371-2700
Fax: (305) 358-5744
Attorneys for Camden Consulting, Inc.

Jon A. Sale, Esq.
Ben Kuehne, Esq.
Sale & Kuehne, P.A.
BankAmerica Tower, Suite 3550
100 S.E. 2nd Street
Miami, FL 33131-2154
Tel: (305) 789-5989
Fax: (305) 789-5987
Attorneys for Peter Lombardi & Relief Def. PJJ Consulting

Linda Schmidt, Esq.
Alise Meredith Johnson, Esq.
SECURITIES & EXCHANGE COMMISSION
801 Brickell Avenue
Suite 1800
Miami, FL 33131
Tel: (305) 982-6322
Fax: (305) 536-4154
Attorneys for Securities & Exchange Commission

Richard Ben-Veniste, Esq.
Lee Rubin, Esq.
Mayer Brown Rowe & Maw
1909 K. Street, N.W.
Washington, DC 20006
Tel: (202) 263-3000
Fax: (202) 263-5333
Attorneys for Joel Steinger & Relief Def. Kensington

George Mahfood, Esquire
Ferrell Schultz
201 South Biscayne Boulevard
Miami, Florida 33131
Tel: (305) 371-8585
Fax: (305) 371-5732
Attorneys for Joel Steinger, Leslie Steinger, Peter Lombardi and PJJ Consulting

EXHIBIT 1

SUMMARY OF THIRD REQUEST FOR INTERIM COMPENSATION OF FEES AND COSTS OF KOZYAK TROPIN & THROCKMORTON, P. A.

1	Name of Applicant	Kozyak Tropin & Throckmorton, P. A.
2	Role of Applicant	Counsel for Receiver
3	Name of certifying professional	David P. Milian
4	Date Receiver appointed	May 4, 2004
5	Date of application for employment	May 26, 2004
6	Date of Order approving employment	June 3, 2004
7	Dates of services rendered	October 1, 2004 through January 31, 2005
8	Total fees requested for this period	\$103,976.05
9	Total expenses requested for this period	\$8,224.12
10	Total fees and expenses requested to be awarded	\$112,200.17

HISTORY OF FEE APPLICATIONS

Application Number	Application Period	Date Submitted	Amount Requested	Amount Awarded	Date Awarded
1 (as amended)	5/4/04 – 6/18/04	07/08/04	\$376,040.99	\$376,040.52	10/27/04; 12/16/04
2	6/19/04 – 9/30/04	12/07/04	\$225,468.06	Pending	Pending
3	10/1/04 – 1/31/05	03/11/05	\$112,200.17	Pending	Pending
TOTAL			\$713,709.22	\$376,040.52	

EXHIBIT 2

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
CONTRERAS-MARTINEZ, CARMEN	Associate	1996	282.00	182.57	51,484.50
SAMOLE DAVID A.	Associate	2002	0.60	212.50	127.50
ROSENDORF, DAVID L.	Associate	1994	0.20	350.00	70.00
MILIAN, DAVID P.	Senior Partner	1990	25.10	350.00	8,785.00
MILIAN, DAVID P.	Senior Partner	1990	0.50	N/C	0.00
KEVA J. LABOSSIERE	Paralegal	n/a	6.90	110.50	762.45
HARTMANN, KENNETH R.	Senior Partner	1987	47.10	350.00	16,485.00
ALMESTICA, LIZA	Paralegal	n/a	7.60	110.50	839.80
ISICOFF, LAUREL M.	Senior Partner	1982	75.00	350.00	26,250.00
MENDEZ, MARIA C.	Paralegal	n/a	0.50	110.50	55.25
PAZ, YAMILE C.	Paralegal	n/a	24.90	112.41	2,799.05
Total Hours by Professionals and Paraprofessionals:					470.40
"Blended" Hourly Rate:					228.87
Sub-total Professionals and Paraprofessionals Fees:					107,658.55
Less courtesy discount: ¹					3,682.50
Total Professionals and Paraprofessionals Fees:					103,976.05

* Indicate any changes in hourly rates during this Application and the date of such change

** Indicate "blended" hourly rate.

¹ As of January 1, 2005, KT&T's hourly rates increased for associates and paralegals only. Since the computer system automatically recalculates the fees at the new hourly rates, KT&T is discounting the difference between the old and new rates. KT&T's next fee petition will reflect its new hourly rates.

EXHIBIT 3

Summary of Professional And Paraprofessional Time by Activity Code Category

Attorney Name	Licensed	Hours	Rate	Fee
SAMOLE DAVID A.	2002	0.60	212.50	127.50
HARTMANN,KENNETH R.	1987	0.10	350.00	35.00
ISICOFF, LAUREL M.	1982	9.30	350.00	3,255.00
		-----	-----	-----
Total for Category ASSET ANALYSIS AND RECOVERY		10.00	341.75	3,417.50
-				
HARTMANN,KENNETH R.	1987	0.20	350.00	70.00
ISICOFF, LAUREL M.	1982	0.10	350.00	35.00
		-----	-----	-----
Total for Category ASSET DISPOSITION		0.30	350.00	105.00
-				
CONTRERAS-MARTINEZ, CARMEN	1996	227.90	182.25	41,535.25
MILIAN, DAVID P.	1990	0.90	350.00	315.00
HARTMANN,KENNETH R.	1987	35.50	350.00	12,425.00
ISICOFF, LAUREL M.	1982	10.30	350.00	3,605.00
		-----	-----	-----
Total for Category BUSINESS OPERATIONS		274.60	210.78	57,880.25
-				
CONTRERAS-MARTINEZ, CARMEN	1996	12.00	179.21	2,150.50
MILIAN, DAVID P.	1990	2.90	350.00	1,015.00
HARTMANN,KENNETH R.	1987	1.10	350.00	385.00
ISICOFF, LAUREL M.	1982	5.10	350.00	1,785.00
		-----	-----	-----
Total for Category INVESTOR AND AGENT COMMUNICATIONS		21.10	252.87	5,335.50

-				
ROSENDORF, DAVID L.	1994	0.20	350.00	70.00
MILIAN, DAVID P.	1990	0.20	350.00	70.00
HARTMANN, KENNETH R.	1987	0.20	350.00	70.00
ALMESTICA, LIZA	n/a	7.60	110.50	839.80
ISICOFF, LAUREL M.	1982	11.20	350.00	3,920.00

		-----	-----	-----
Total for Category		19.40	256.18	4,969.80

CASE ADMINISTRATION

-				
ISICOFF, LAUREL M.	1982	0.10	350.00	35.00
PAZ, YAMILE C.	n/a	0.80	110.50	88.40

		-----	-----	-----
Total for Category		0.90	137.11	123.40

CLAIMS ADMINISTRATION AND OBJECTIONS

-				
CONTRERAS-MARTINEZ, CARMEN	1996	11.80	174.32	2,057.00
ISICOFF, LAUREL M.	1982	0.90	350.00	315.00

		-----	-----	-----
Total for Category		12.70	186.77	2,372.00

EMPLOYEE MATTERS/PENSION

-				
CONTRERAS-MARTINEZ, CARMEN	1996	0.30	170.00	51.00
MILIAN, DAVID P.	1990	0.70	350.00	245.00
KEVA J. LABOSSIERE	n/a	2.30	110.50	254.15
ISICOFF, LAUREL M.	1982	3.00	350.00	1,050.00
PAZ, YAMILE C.	n/a	21.70	111.60	2,421.65

		-----	-----	-----
Total for Category		28.00	143.64	4,021.80

FEE/EMPLOYMENT APPLICATIONS (PROFESSIONALS)

MILIAN, DAVID P.	1990	0.30	350.00	105.00
HARTMANN, KENNETH R.	1987	5.70	350.00	1,995.00
MENDEZ, MARIA C.	n/a	0.50	110.50	55.25
		-----	-----	-----
Total for Category LITIGATION		6.50	331.58	2,155.25
-				
CONTRERAS-MARTINEZ, CARMEN	1996	25.90	190.02	4,921.50
MILIAN, DAVID P.	1990	16.80	350.00	5,880.00
MILIAN, DAVID P.	1990	0.50	N/C	0.00
KEVA J. LABOSSIERE	n/a	1.60	110.50	176.80
HARTMANN, KENNETH R.	1987	4.00	350.00	1,400.00
ISICOFF, LAUREL M.	1982	33.70	350.00	11,795.00
PAZ, YAMILE C.	n/a	2.40	120.42	289.00
		-----	-----	-----
Total for Category LITIGATION - SEC		84.90	288.13	24,462.30
-				
CONTRERAS-MARTINEZ, CARMEN	1996	4.00	188.06	752.25
MILIAN, DAVID P.	1990	0.50	350.00	175.00
HARTMANN, KENNETH R.	1987	0.30	350.00	105.00
ISICOFF, LAUREL M.	1982	1.30	350.00	455.00
		-----	-----	-----
Total for Category LITIGATION - THIRD PARTY		6.10	243.81	1,487.25
-				
CONTRERAS-MARTINEZ, CARMEN	1996	0.10	170.00	17.00
MILIAN, DAVID P.	1990	2.80	350.00	980.00
KEVA J. LABOSSIERE		3.00	110.50	331.50
		-----	-----	-----
Total for Category LITIGATION - ADMINISTRATIVE		5.90	225.17	1,328.50
-				
Grand Total		470.40	228.87	107,658.55

EXHIBIT 4

**Summary of Requested Reimbursement Of Expenses
for this Time Period Only**

1.	Filing Fees	\$0.00
2.	Process Service Fees	\$0.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$617.60
5.	Lien and Title Searches	\$0.00
6.	Photocopies	\$819.45
	(a) In-house copies (5,463 @ \$.15)	
	(b) Outside copies - actual costs (\$0.00)	
7.	Postage	\$97.85
8.	Overnight Delivery Charges	\$4,691.11
9.	Outside Courier/Messenger Service	\$513.14
10.	Long Distance Telephone Charges	\$547.48
11.	Fax Transmissions ..	\$497.00
12.	Computerized Research	\$258.39
	Westlaw - \$0.00	
	Pacer - \$194.39	
	ChoicePoint Search Engine - \$64.00	
	(locate viators)	
13.	Travel Expenses ..	\$0.00
	(a) _____ (\$0.00)	
14.	Other ..	\$475.56
	(a) Litigation Graphix (imaging to CD - 6/16/04) (\$32.10)	
	(b) Trademark registration of domain name "Mutualben.mail.com" (\$150.00)	
TOTAL EXPENSE REIMBURSEMENT REQUESTED		\$8,224.12

249566.1/3298-101

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO
Magistrate Judge Garber

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP.,
JOEL STEINGER a/k/a JOEL STEINER,
LESLIE STEINGER a/k/a LESLIE STEINER,
and PETER LOMBARDI,

Defendants,

VIATICAL BENEFACTORS, LLC,
VIATICAL SERVICES, INC.,
KENSINGTON MANAGEMENT, INC.,
RAINY CONSULTING CORP.
TWIN GROVES INVESTMENTS, INC.,
P.J.L. CONSULTING, INC.,
SKS CONSULTING, INC., and
CAMDEN CONSULTING, INC.,

Relief Defendants.

ORDER

THIS CAUSE came before the Court on Kozyak Tropin and Throckmorton, P.A.'s Third Interim Application for Fees and Costs. The Court has heard comments by interested parties, carefully reviewed the Application and case file and is otherwise fully advised in the premises.

THE COURT notes that by prior Order this Court authorized the Receiver to "appoint one or more special agents, employ legal counsel, actuaries, accountants, claims administrators, clerks,

consultants and assistants as the Receiver deems necessary and to fix and pay their reasonable compensation and expenses”subject to the approval by this Court at the time the Receiver accounts to the Court for such expenditures and compensation.

Pursuant to that provision, by prior Order the Court approved Receiver’s application to employ Kozyak Tropin and Throckmorton, P.A. (“KTT”) as Receiver’s counsel in this action. In the instant Application, KTT seeks to have the Court authorize the Receiver to compensate KTT for services rendered for the period from October 1, 2004 through January 31, 2005. In total, the Application seeks approval of the payment of \$112,200.17 consisting of \$103,976.05 in fees and \$8,224.12 in costs, which reflect negotiated reductions totaling \$17,306.95.

Accordingly, after due consideration, it is

ORDERED and **ADJUDGED** that Kozyak Tropin and Throckmorton P.A.’s Third Interim Application for Fees and Costs is hereby **GRANTED** and Receiver, Roberto Martínez is hereby authorized to pay Kozyak Tropin & Throckmorton, P.A. the sum of \$ _____ which represents reasonable fees and costs incurred during the Application Period.

DONE and **ORDERED** in Chambers in the Southern District this ____ day of _____, 2005, in Miami, Florida.

Copies furnished to:

All parties on the attached service list.

SERVICE LIST

SEC v. MBC, et al.

Case No. 04-60573-CIV-MORENO/Garber

Teresa J. Verges, Esq.
Securities & Exchange Commission
801 Brickell Avenue, Suite 1800
Miami, FL 33131
Tel: 305/982-6300/Fax: 305/536-4154

Robert Martínez, Receiver
Marc Cooper, Esq.
Colson Hicks Eidson
255 Aragon Avenue, 2nd Floor
Coral Gables, Florida 33134
Tel: 305/476-7400/Fax: 305/476-7444

David P. Milian, Esq.
Kozyak Tropin & Throckmorton, P.A.
200 South Biscayne Blvd., Suite 2800
Miami, FL 33131
Tel: 305/372-1800/Fax: 305/372-3508

Richard Ben-Veniste, Esq.
Lee Rubin, Esq.
1909 K. Street, NW
Washington, DC 20006
Tel: 202/263-3000/Fax: 202/263-3300

Bruce A. Zimet, Esq.
Bruce A. Zimet, P.A.
One Finacial Plaza, Suite 2612
Ft. Lauderdale, FL 33394
Tel: 954/764-7081/Fax: 954/760-4421

Jon A. Sale, Esq.
Ben Kuehne, Esq.
Sale & Kuehne, P.A.
100 SE 2nd Street
Miami, FL 33131
Tel: 305/789-5989/Fax: 305/789-5987

Faith E. Gay, Esq.
White & Case, LLP
4900 Wachovia Financial Center

200South Biscayne Blvd.
Miami, FL 33131
Tel: 305/371-2700/Fax: 305/358-5744

William Berger, Esq.
Chad J. Tamaroff, Esq.
Greenspoon, Marder, et al.
100 West Cypress Creek Road., Suite 700
Ft. Lauderdale, FL 33309
Tel: 888/491-1120/Fax: 954/771-9264

John M. Hogan, Esq.
Holland & Knight, LLP
701 Brickell Avenue, Suite 3000
Miami, FL 33131
Tel: 305/374-8500/Fax: 305/789-7799

James J. Blosser, Esq.
Justin J. Sayfie, Esq.
Blosser & Sayfie
450 East Las Olas Blvd.
Fort Lauderdale, FL 33301
Tel: 954/523-2427/Fax: 954/523-9146

Miguel Diaz de la Portilla, Esq.,
Luis Rojas, Esq.
Duane Morris, LLP
200 South Biscayne Blvd.
Wachovia Financial Center
Suite 3400
Miami, FL 33131
Tel: 305/960-2400/Fax: 305/960-2201

William L. Petros, Esq.
William L. Petros, P.A.
4090 Laguna Street, 2nd Floor
Coral Gables, FL 33146
Tel: 305/446-3699/Fax: 305/446-2799

Hilarie Bass, Esq.
Greenburg Traurig, P.A.

SERVICE LIST

SEC V. MBC, et al.

Case No. 04-60573-CIV-MORENO/Garber

1221 Brickell Avenue
Miami, FL 33131
Tel: 305/579-0745/Fax: 305/579-0717

Victor M. Diaz, Jr., Esq.
Podhurst Orseck Josefsberg, et al.
City National Bank Building
25 West Flagler St., Suite 800
Miami, FL 33130-1780
Tel: 305/358-2800/Fax: 305/358-2382

Steven G. Schwartz, Esq.
Manny M. Tarich, Esq.
Schwartz & Horwitz, P.A.
3301 NW Boca Raton Blvd., Suite 200
Boca Raton, FL 33431
Tel: 561/395-4747/Fax: 561/367-1550

Joseph P. D'Ambrosio, Esq.
Miller Kagan, et al.
One Boca Place
2255 Glades Rd., Suite 236W
Boca Raton, FL 33431
Tel: 561/989-8878/Fax: 561/989-8857

Roma W. Theus, II, Esq.
Edwards & Angell, LLP
350 East Las Olas Blvd., Suite 1150
Ft. Lauderdale, FL 33301
Tel: 954/667-6127/Fax: 954/727-2601