

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP., et al.,

Defendants,

VIATICAL BENEFACTORS, LLC, et al.,

Relief Defendants.

**RECEIVER'S MOTION FOR ENTRY OF ORDER IN FURTHERANCE OF
ORDER GRANTING RECEIVER'S MOTION TO JOIN ADDITIONAL INSURERS
IN ORDER APPROVING SETTLEMENT REGARDING FUTURE ADMINISTRATION
OF CERTAIN INSURANCE POLICIES SUBJECT TO THIS PROCEEDING
AND BAR ORDER**

Roberto Martínez, court-appointed receiver ("Receiver") of Mutual Benefits Corp. ("MBC"), Viatical Benefactors, LLC ("VBLLC"), Viatical Services, Inc. ("VSI"), and Anthony Livoti, Jr. and Anthony Livoti, Jr., P.A., solely in their capacity as trustee (collectively the "Receivership Entities"), in furtherance of this Court's March 5, 2009 Order Granting Receiver's Motion to Join Additional Insurers in Order Approving Settlement Regarding Future Administration of Certain Insurance Policies Subject to this Proceeding and Bar Order ("MetLife Additional Insurers Order", D.E. #2258) moves for this court to enter a further Order in the form attached hereto, in furtherance of the MetLife Additional Insurers Order. In support, the Receiver states:

1. On February 25, 2009, the Receiver filed his Receiver's Motion to Join Additional Insurers in Order Approving Settlement Regarding Future Administration of Certain Insurance Policies Subject to this Proceeding and Bar Order (D.E. #2244) by which the Receiver sought the

joinder of an additional group of insurance companies to the agreement to abide by certain procedures and relief as provided in the Court's May 1, 2007 Order Regarding Future Administration of Certain Insurance Policies Subject to this Proceeding (D.E. #1887) ("Future Administration Order"). On March 5, 2009 the Court entered the MetLife Additional Insurers Order, granting the relief requested by the Receiver.


2. Thereafter, and in accordance with the MetLife Additional Insurers Order, notice was given to the investors in the affected policies of the relief granted by the MetLife Additional Insurers Order. A copy of the Affidavit of Service (without voluminous exhibits) is attached hereto as Exhibit "A."

3. No objections were received to the relief provided by the MetLife Additional Insurers Order, and consistent therewith, the Receiver now requests the entry of an Order, in the form attached hereto, providing for the subject insurers to be governed by the procedures and provided the protections set forth in the Court's May 1, 2007 Future Administration Order. The form of the attached Order is in substance identical to the Future Administration Order.

WHEREFORE, the Receiver respectfully requests that the Court enter an Order in the form attached hereto as Exhibit "B", in furtherance of the MetLife Additional Insurers Order, providing for the additional insurers designated therein to be subject to the procedures and protections set forth therein.


Respectfully submitted,

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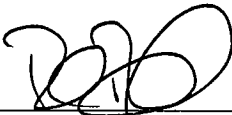
- and -

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served in accordance with the attached Receiver's Service List on September 14, 2009.

By: 
David L. Rosendorf

SERVICE LIST OF RECEIVER

Case No.: 04-60573 CIV-Moreno

VIA ELECTRONIC MAIL		
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