

Defendants and has obtained judgments against others. Good faith recovery estimates for each are as follows:

1. Adam Shaw - None. Dismissed because of bankruptcy.
2. Thomas/Linda Smith - Judgment entered in the amount of \$81,989.00. Settlement offer pending.
3. Michael Klein - Settled for \$30,000.00.
4. Leon Hurst/Summit Marketing - Unknown at this time.
5. Bancorp Mortgage - Judgment entered in the amount of \$24,000.00. Collectability currently unknown.
6. Caton & Associates, Inc. - Unknown at this time.
7. Simplified Communications, Inc. - Settled for \$26,993.65, subject to Court approval.
8. Chatham International/Thomas McCrimmon - Unknown at this time.
9. Greg Skibbee/United Holdings Corp. - Unknown at this time.
10. Rick Shirrell - Judgment entered in the amount of \$98,377.50. Collectability unknown.
11. Jeffrey Matz - Unknown at this time.
12. Christopher Carlson - Unknown at this time.
13. Murray Stucker - Judgment entered for \$156,700.00. Collectability unknown.
14. Larry Lewis - None. Dismissed.

Litigation Budget

<u>Stage</u>	<u>Total Hours (Estimate)</u>	<u>Attorney Compensation (Hourly Rate)</u>	<u>Estimated Costs</u>	<u>Total</u>
Preliminary Investigation	Completed			

<u>Stage</u>	<u>Total Hours (Estimate)</u>	<u>Attorney Compensation (Hourly Rate)</u>	<u>Estimated Costs</u>	<u>Total</u>
Legal Research	40	\$200.00	\$ 250.00	\$ 8,250.00
Pleading Preparation	10	\$200.00	\$ 100.00	\$ 2,100.00
Formal Discovery				
Pre-judgment	130	\$200.00	\$15,000.00	\$41,000.00
Post-judgment	200	\$200.00	\$25,000.00	\$65,000.00
Judgment Collection Activities	250	\$200.00	\$25,000.00	\$75,000.00
Settlement Discussions and Documentation	50	\$200.00	\$ 500.00	\$10,500.00
Administrative (fee apps, etc.)	20	\$250.00	\$ 100.00	\$ 5,100.00
Expert Witnesses	Unable to estimate at this time			
Dispositive Motions	50	\$200.00	\$ 100.00	\$10,100.00
Trial Preparation	50	\$200.00	\$ 100.00	\$10,100.00
Trial	50	\$200.00	\$ 100.00	\$10,100.00
Total Estimated Fees and Costs:			\$237,250.00	

The foregoing estimates **do not include** the amounts sought in the Receiver's Third Interim Application which is currently pending before the Court or fees during March 2001. All estimates cover the period of April 1, 2001 forward.

DATED this 4th day of April 2001.

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

A true and correct copy of this document was mailed on April 4th, 2001, via first class mail to the following:

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