

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-against- :

WILLIAM GOREN and NEW AGE FINANCIAL
SERVICES, :

Defendants, :

-and- :

NEW TIMES SECURITIES SERVICES, INC., :

Relief Defendants. :

Civil Action No. CV 00-970 (TCP)

**NOTICE OF MOTION FOR AN ORDER (1) AUTHORIZING PAYMENT OF THE FEES
AND EXPENSES OF THE CLAIMS ADMINISTRATOR**

TO: All Investors, Creditors and Parties-In-Interest of William Goren and New Age Financial
Services

PLEASE TAKE NOTICE, that on ^{MAY}~~April~~ 11, 2007, at 1:30 p.m., or as soon thereafter

as counsel may be heard, the undersigned, Claims Administrator shall move before the Honorable
Thomas C. Platt, United States District Court Judge, at the United States District Court for the
Eastern District of New York, 1044 Long Island Federal Courthouse Central Islip, New York 117-
22-1044, for an Order (1) authorizing Claims Administrator, John J. Scura II, Esquire his fees and
expenses.

OBJECTION DEADLINE

PLEASE TAKE FURTHER NOTICE, that all responses or objections, if any, to the relief
sought in the Fee Application shall be filed with the Clerk of the Court and served upon: (i) counsel
for the Receiver, Kaye Scholer LLP, 425 Park Avenue, New York, NY 10022 (Attn: Andrew

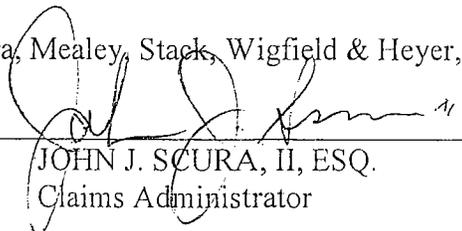
Kress, Esq.), (ii) the Securities and Exchange commission, 3 World Financial Center, New York, New York 10281 (Attn: Bennett Ellenbogen, Esq.), (iii) the Claims Administrator, Scura, Mealey, Scura & Stack, LLP, 1599 Hamburg Turnpike, P.O. Box 2031, Wayne, NJ 07470 (Attn: John J. Scura II, Esq.), (iv) counsel for William Goren, Morvillo Abramowitz Grand Iason & Silberberg, P.C., 565 Fifth Avenue, New York, New York 10017 (Attn: Jeremy H. Temkin, Esq., (v) FTI Consulting, Inc., 622 Third Avenue, 31st Floor, New York, New York 10017-6707 (Attn: Mr. Scott Friedland) (Collectively, the "Objection Notice Parties"), so that such responses or objections are filed and actually received not later than April 30, 2007 at 12:00 noon (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application of the Claims Administrator of the Receiver, and exhibits annexed thereto, which set forth the relevant factual basis upon which the relief requested should be granted. A proposed form of Order is also submitted herewith. It is the undersigned's opinion that there are no complicated legal issues and a brief is not required.

PLEASE TAKE FURTHER NOTICE, that the Hearing on the Fee Application may be adjourned from time to time without further notice other than by announcement in Court on the date scheduled for the Hearing.

Dated: Wayne, New Jersey
March 30, 2007

Scura, Mealey, Stack, Wigfield & Heyer, LLP

BY: 

JOHN J. SCURA, II, ESQ.
Claims Administrator