

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Virginia

UNITED STATES SECURITIES AND )  
EXCHANGE COMMISSION, )  
)  
*Plaintiff,* )  
)  
v. ) Civil Action No. 1:06-cv-01354 GBL/TRJ  
)  
INTERNATIONAL FIDUCIARY )  
CORP., S.A. et al., )  
)  
*Defendants,* )  
)  
TERRY MARTIN et al., )  
)  
*Relief Defendants.* )

**Consent Motion of Relief Defendants  
Terry Martin, CD2E, Inc., Winchell Corp.,  
and M&M Technologies, Inc.  
for Extension of Time to Respond  
to SEC's Motion for Summary Judgment**

Relief defendants Terry Martin, CD2E, Inc., Winchell Corp., and M&M Technologies, Inc. hereby move, with the plaintiff's consent, that the deadline for them to file their opposition to the plaintiff's motion for summary judgment be extended through May 30, 2008. The grounds for this motion are as follows:

1. The movants were served with the summary-judgment motion by Federal Express on Tuesday, May 6, 2008 and received it on Wednesday, May 7. Without an extension, the movants' opposition would be due by May 20, 2008. The motion is scheduled to be heard on Friday, June 6, 2008.

2. The movants are engaged in discussions with the SEC regarding a possible disposition of this case. Those discussions might eliminate the need for the movants to

expend time and money on preparing an opposition. Extending the deadline for opposing the SEC's motion would increase the amount of time within which the parties could continue their discussions before it became necessary to begin working on the opposition.

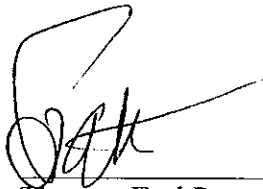
3. The extension we request will not prejudice the SEC, as indicated by the SEC's consent to this request. Nor will it delay the hearing on the SEC's motion.

WHEREFORE, the relief defendants named above request that their deadline for filing an opposition to the SEC's motion for summary judgment be extended through May 30.

Respectfully submitted,

TERRY MARTIN, CD2E, INC.,  
WINCHELL CORP., AND M&M TECHNOLOGIES, INC.

By Counsel



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*Counsel for Relief Defendants Terry  
Martin, CD2E, Inc., Winchell Corp., and  
M&M Technologies, Inc.*

**Certificate of Service**

I HEREBY CERTIFY that a copy of the foregoing Consent Motion for Extension of Time to Respond to SEC's Motion for Summary Judgment was served on the following by the means indicated, on this 2<sup>nd</sup> day of May, 2008:

**By email and first-class mail, postage prepaid:**

Carl A. Tibbetts, Esq.  
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CANADA  
*Relief Defendant*

SZE Coast Operating Corp.  
c/o Robert Lowery or Doug Loni  
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CANADA  
*Relief Defendant*



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Thomas Earl Patton (VSB No. 22089)