

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

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

**Unopposed Motion of Relief Defendants
Terry Martin, CD2E, Inc., Winchell Corp.,
and M&M Technologies, Inc.
to Modify Caption on Receiver’s Notices to Claimants**

Relief defendants Terry Martin, CD2E, Inc., Winchell Corp., and M&M Technologies, Inc. move that the captions on the notices the Receiver will be sending to potential claimants and publishing in various newspapers be modified to delete the reference to the relief defendants. The grounds for this motion are as follows:

1. The Receiver’s notices will be widely circulated and will be published in several newspapers, including newspapers in the movants’ home community. As a result, the notices are likely to be seen by many people who did not invest in IFC but who do business or otherwise deal with the movants. If the notices’ captions refer to the relief defendants, persons seeing the notices could form a mistaken impression about the nature of the relief defendants’ involvement in this action, which could have adverse business and economic effects on the relief defendants.

2. It is unnecessary for the Receiver's notices to refer to the relief defendants in the captions. None of the relief defendants is in receivership, so that any claims against relief defendants will not be part of the claims process. Deleting the reference to the relief defendants will therefore have no substantive effect on the claims process.

3. We do not seek any change in the text of the notices.


4. The movants are close to finalizing a settlement with the SEC and the Receiver, and in connection with the settlement negotiations, the SEC and the Receiver have stated that they do not oppose the relief sought by this motion. We expect shortly to submit a consent order signed by the movants, the SEC, and the Receiver.

WHEREFORE, Relief defendants Terry Martin, CD2E, Inc., Winchell Corp., and M&M Technologies, Inc. request that this motion be granted.

Respectfully submitted,

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

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Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing motion and the accompanying brief in support thereof were served on the following by the means indicated, on this 9th day of July, 2008:

By email and first-class mail, postage prepaid:

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