

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

<p>SECURITIES AND EXCHANGE COMMISSION,</p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>MOBILE BILLBOARDS OF AMERICA, INC., INTERNATIONAL PAYPHONE COMPANY, TIGER MEDIA, INC., RESERVE GUARANTY TRUST, CALIFORNIA MOBILE BILLBOARDS, INC., WESTERN RESERVE GUARANTY TRUST, MICHAEL A. LOMAS and MICHAEL L. YOUNG,</p> <p style="text-align:center">Defendants.</p>	<p style="text-align:center">CIVIL ACTION NO. 1:04-CV-2763-WBH</p>
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**MOTION FOR APPROVAL
OF SETTLEMENT AGREEMENT AND RELEASE**

COMES NOW S. Gregory Hays (“Receiver”), the court-appointed Receiver for Mobile Billboards of America, Inc., California Mobile Billboards, Inc. and other affiliated entities, by and through his counsel of record, files this motion seeking approval of the Settlement Agreement and Release with Heiser & Jesko, CPA’s and its principals and their professional liability insurance carrier, Philadelphia Indemnity Insurance Company. A true and correct copy of the Settlement Agreement is attached hereto as Exhibit “A”.

In support of this motion, the Receiver has filed his Memorandum in Support

of Motion for Approval of Settlement Agreement and Release, along with the
Affidavit of Donald Jesko.

Respectfully submitted, this 29th day of March, 2006.

TROUTMAN SANDERS LLP

/s/ J. David Dantzler, Jr.
J. DAVID DANTZLER, JR.
Georgia Bar No. 205125
MATTHEW R. CLARK
Georgia Bar No. 141401

Attorneys for Receiver

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2006, I electronically filed the Motion for Approval of Settlement Agreement and Release with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all parties of record.

/s/ Matthew R. Clark
J. DAVID DANTZLER, JR.
Georgia Bar No. 205125
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