

**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 CORPORATION, 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 THE
RECEIVER’S PLAN FOR CLAIMS ADMINISTRATION AND
DISTRIBUTION OF PROCEEDS**

S. Gregory Hays, Receiver for Defendants Mobile Billboards of America, Inc. (“MBA”), International Payphone Corporation (“IPC”) d/b/a Outdoor Media Industries (“Outdoor Media”); Tiger Media, Inc. (“Tiger Media”); Reserve Guaranty Trust (“RGT”); California Mobile Billboards, Inc. (“CMBI”); and, Western Reserve Guaranty Trust (“WGRT”) (collectively referred to as the “Receiver Entities” or the “Receiver Estate”), files his Motion for the Court to

Approve Plan for the Distribution of Proceeds. The proposed Plan for the Distribution of Proceeds is attached hereto as Exhibit "A." Notice of the Receiver's Motion is attached hereto as Exhibit "B."

In support of this motion, the Receiver relies on his supporting brief, the Interim Reports he has filed in this case, and the Plan of Distribution, filed contemporaneously herewith.

WHEREFORE, S. Gregory Hays, Receiver, respectfully requests that the Court grant his Motion for Approval of the Receiver's Plan for the Distribution of Proceeds.

This 12th day of October, 2008.

By: /s/ Merle R. Arnold III
J. David Dantzler, Jr.
Georgia Bar No. 205125
Merle R. Arnold III
Georgia Bar No. 023503
Attorneys for S. Gregory Hays,
Receiver For Defendants Mobile Billboards
of America, Inc., et. al.

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CERTIFICATE OF SERVICE

This is to certify that on October 12, 2008, I electronically filed ***Motion For Approval Of The Receiver's Plan For Claims Administration and Distribution Of Proceeds*** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

James Alexander Rue
William P. Hicks
Julie M. O'Daniel, Esq.
Nina Marino, Esq.

This 12th day of October, 2008.

By: /s/ Merle R. Arnold III
J. David Dantzler, Jr.
Georgia Bar No. 205125
Merle R. Arnold III
Georgia Bar No. 023503
Attorney for S. Gregory Hays,
Receiver For Defendants Mobile Billboards
of America, Inc., International Payphone
Corporation, Reserve Guaranty Trust and
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