

EXHIBIT "B"

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9 LAW OFFICE OF ERIC HONIG
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11 Attorney at Law
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13 Marina del Rey, CA 90295
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16 Attorneys for Claimant
17 John W. Hollis

11 UNITED STATES BANKRUPTCY COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14 In re:
15 Petition of Malcom Butterfield, Brian
16 Glasgow and Simon Whicker as
17 Foreign Representatives of the St.
18 Vincent and the Grenadines Foreign
19 Proceeding Respecting the St. Vincent
20 and the Grenadines International
21 Business Company known as
22 Tri-Continental Exchange Ltd.,
23 Debtor in a Foreign Proceeding

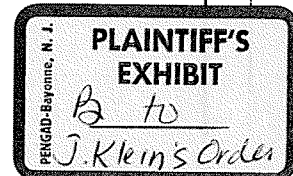
Chapter 15
Case No. 2006-22652-c-15
STIPULATION REGARDING
\$225,958.84 IN U.S. CURRENCY
SEIZED FROM BANK OF AMERICA
ACCT. NO. 004653665607 AND
CLAIMED BY JOHN W. HOLLIS;
ORDER THEREON

Date: August 29, 2006
Time: 2:30 p.m.
Ctrm: 35

22 In re:
23 Petition of Malcom Butterfield, Brian
24 Glasgow and Simon Whicker as
25 Foreign Representatives of the St.
26 Vincent and the Grenadines Foreign
27 Proceeding Respecting the St. Vincent
28 and the Grenadines International
Business Company known as
Combined Services Ltd.,
Debtor in a Foreign Proceeding

Chapter 15
Case No. 2006-22655-b-15
STIPULATION REGARDING
\$225,958.84 IN U.S. CURRENCY
SEIZED FROM BANK OF AMERICA
ACCT. NO. 004653665607 AND
CLAIMED BY JOHN W. HOLLIS;
ORDER THEREON

Date: August 29, 2006
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1 In re:
2 Petition of Malcom Butterfield, Brian
3 Glasgow and Simon Whicker as
4 Foreign Representatives of the St.
5 Vincent and the Grenadines Foreign
6 Proceeding Respecting the St. Vincent
7 and the Grenadines International
8 Business Company known as
9 Alternative Marketing Exchange Ltd.,
10 Debtor in a Foreign Proceeding

Chapter 15

Case No. 2006-22657-a-15

STIPULATION REGARDING
\$225,958.84 IN U.S. CURRENCY
SEIZED FROM BANK OF AMERICA
ACCT. NO. 004653665607 AND
CLAIMED BY JOHN W. HOLLIS;
ORDER THEREON

Date: August 29, 2006
Time: 2:30 p.m.
Ctm: 35

9 WHEREAS the United States filed a civil forfeiture action, United States v.
10 \$1,200,000 et al., Civ. S-05-149-DFL, against funds seized from the personal bank
11 account of claimant John W. Hollis at Bank of America, Acct. No. 004653665607;

12 AND WHEREAS Mr. Hollis is claiming \$225,958.84 seized from his
13 personal bank account, which action is currently pending before the United States
14 District Court;

15 AND WHEREAS foreign representatives of three debtor companies have
16 sought to transfer these funds to the Bankruptcy Court by way of a Chapter 15
17 petition pending in this case;

18 AND WHEREAS the parties now agree that the civil forfeiture action against
19 the \$225,958.84 should properly continue to proceed before the District Court until
20 the matter in that court and any appellate court is concluded, and that these funds
21 should not now be transferred;

22 NOW THEREFORE the foreign representative petitioners, the United States
23 of America and claimant John W. Hollis hereby agree and stipulate that the civil
24 forfeiture case involving the \$225,958.84 in funds seized from John W. Hollis'
25 personal bank account shall remain in the United States District Court where the
26 issues alleged in the complaint for forfeiture may be litigated along with relevant
27 defenses and any other issues appropriately raised. If the District Court finds that
28 John W. Hollis has Article III standing to challenge the forfeiture, and thereafter

1 Hollis prevails on the merits of the United States' forfeiture action, the funds will be
2 returned to him pursuant to the judgment of the District Court. If John W. Hollis is
3 unable to demonstrate Article III standing, and the District Court so finds, and/or the
4 United States prevails on the merits of the forfeiture action, and there is a final
5 judgment of the District Court that is no longer subject to any right of appeal or other
6 review by any court, then the government shall deliver the Bank of America funds,
7 plus all accumulated interest, to the petitioners as foreign representatives of the SVG
8 proceeding, pursuant to section 542(a) of the Bankruptcy Code.

9 DATED: August __, 2006

Respectfully submitted,
SHERMAN & SHERMAN
A Professional Law Corporation
LAW OFFICE OF ERIC HONIG

13
14 By:

JANET SHERMAN
Attorneys for Claimant
John W. Hollis

15
16 DATED: August 29, 2006

McGREGOR W. SCOTT
United States Attorney

17
18
19 By:

Kristin S. Door
KRISTIN S. DOOR
Assistant United States Attorney
Attorneys for United States of America

20
21 DATED: August 29, 2006

LORD BISSELL & BROOK LLP

22
23 By:

Forrest B. Lammiman
FORREST B. LAMMIMAN
Attorneys for Petitioners

24
25 **ORDER**

26 IT IS SO ORDERED.

27
28 DATED: _____

UNITED STATES BANKRUPTCY JUDGE

Aug-29-2006 11:11am From

+9103887530


T-838 P.004/004 F-242

1 Hollis prevails on the merits of the United States' forfeiture action, the funds will be
 2 returned to him pursuant to the judgment of the District Court. If John W. Hollis is
 3 unable to demonstrate Article III standing, and the District Court so finds, and/or the
 4 United States prevails on the merits of the forfeiture action, and there is a final
 5 judgment of the District Court that is no longer subject to any right of appeal or other
 6 review by any court, then the government shall deliver the Bank of America funds,
 7 plus all accumulated interest, to the petitioners as foreign representatives of the SVG
 8 proceeding, pursuant to section 542(a) of the Bankruptcy Code.

9 DATED: August 27, 2006

Respectfully submitted,
 SHERMAN & SHERMAN
 A Professional Law Corporation
 LAW OFFICE OF ERIC HONIG

10
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13
14 By:


 JANET SHERMAN
 Attorneys for Claimant
 John W. Hollis

15
16 DATED: August ____, 2006

McGREGOR W. SCOTT
 United States Attorney

17
18
19 By:

KRISTIN S. DOOR
 Assistant United States Attorney
 Attorneys for United States of America

20
21 DATED: August ____, 2006

LORD BISSELL & BROOK LLP

22
23 By:

FORREST B. LAMMIMAN
 Attorneys for Petitioners

24
25 **ORDER**

26 IT IS SO ORDERED.

27
28 DATED: _____

UNITED STATES BANKRUPTCY JUDGE



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September 11, 2006

Joshua D. Wayser

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Fax: 213.341.6712
jwayser@lordbissell.com

VIA E-FILING

Clerk to the Honorable Christopher Klein
United States Bankruptcy Court
505 I Street
Sacramento, California 95814

Re: In re Tri-Continental Exchange, Ltd.; In re Combined Services, Ltd.; In re Alternate Market
Exchange Ltd.; Case Nos. 06-22652, 22655 and 22657

Dear Clerk:

We are lodging herewith a proposed order approving the modified stipulation between the United States of America, the above-captioned debtors and John W. Hollis. Please note that the proposed order was previously sent to all counsel that participated in the initial hearing in the above cases on August 29, 2006. Counsel have either approved of the form of order or made no comment thereto.

Sincerely,



Joshua D. Wayser

Enclosure

cc: Mr. Lammiman (via e-mail)

ATLANTA | CHICAGO | LONDON | LOS ANGELES | NEW YORK | SACRAMENTO | WASHINGTON

RECEIVED
September 11, 2006
CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
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