

2. The Plaintiffs are entitled to a default against the Separate Defendants for said failure.

3. Plaintiffs concurrently file a brief in support of their Motion.

WHEREFORE, Plaintiffs pray that the Separate Defendants be found to be in default and for all other appropriate relief to which they may be entitled, including but not limited to costs and attorney's fees.

Dated: May 3, 2007.

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SIMS, On Behalf of Themselves and
Others Similarly Situated, PLAINTIFFS
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CERTIFICATE OF SERVICE

I, the undersigned, of Lundy & Davis, L.L.P., state that I have caused the above and foregoing document to be served upon defense counsel via e-mail transmission, as follows:

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on this 3rd day of May, 2007.

/s/ Jason M. Hatfield
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