

PLAINTIFF EXHIBIT NO.	OBJECTION
522-524	Defendants object to these exhibits on the grounds that they are improper compilations of evidence. To the extent Plaintiff wishes to offer complete individual documents, Defendants reserve the right to object to those exhibits at the time offered. Defendants further object to these exhibits on the grounds that the documents are (in whole or in part) not relevant because they pertain only to First Funds, LLC, <i>see</i> FED. R. EVID. 401 & 402.
526-551	Defendants object to these exhibits on the grounds that they were not produced to Defendants during the discovery period, <i>see</i> FED. R. CIV. P. 26.
452	Defendants object to this exhibit on the grounds that the document is (in whole or in part) not relevant because it pertains only to FastTransact, Inc. dba Simple Cash, <i>see</i> FED. R. EVID. 401 & 402. Defendants further object to this exhibit on the grounds that it was not produced to Defendant during the discovery period, <i>see</i> FED. R. CIV. P. 26.

June 28, 2007

Respectfully submitted,

By :/s/ Joseph D. Gray

William G. Schuurman (TX State Bar No. 17855200)

bschuurman@velaw.com

Brian K. Buss (TX State Bar No. 00798089)

bbuss@velaw.com

Joseph D. Gray (TX State Bar No. 24045970)

jgray@velaw.com

R. Floyd Walker (TX State Bar No. 24044751)

fwalker@velaw.com

Graham E. Sutliff (TX State Bar No. 24046935)

gsutliff@velaw.com

VINSON & ELKINS L.L.P.

2801 Via Fortuna, Suite 100

Austin, Texas 78746

Telephone: 512.542.8400

Facsimile: 512.236.3476

Hilary L. Preston

hpreston@velaw.com

VINSON & ELKINS L.L.P.

666 Fifth Avenue – 26th Floor

New York, NY 10103

Telephone: 212.237.0000

Facsimile: 212.237.0100

Douglas R. McSwane, Jr. (TX State Bar No. 13861300)

J. Matt Rowan (TX State Bar No. 24033137)

POTTER MINTON

A Professional Corporation

110 N. College

500 Plaza Tower (75702)

P.O. Box 359

Tyler, Texas 75710

Telephone: 903.597.8311

Facsimile: 903.593.0846

E-mail: dougmcswane@potterminton.com

*Counsel for Defendants Merchant Money Tree, Inc. and
Reach Financial, LLC*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 28th day of June, 2007. Any other counsel of record will be served by first class mail on this same date.

/s/ Joseph D. Gray

Joseph D. Gray