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03 MAY 19 PM 2:59

CLERK, U.S. BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA

BY: JK DEPUTY

1 RICHARD L. WYNNE (SBN 120349)  
2 BENNETT L. SPIEGEL (SBN 129558)  
3 CHRISTOPHER L. FROST (SBN 200336)  
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9 Attorneys for Official Committee of  
10 Unsecured Creditors

11 **UNITED STATES BANKRUPTCY COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **NORTHERN DIVISION**

14 In re

15 REED E. SLATKIN and Substantively  
16 Consolidated Affiliates TOPSIGHT  
17 OREGON, LLC, and REED SLATKIN  
18 INVESTMENT CLUB, L.P.,

19 Debtors.

20 Case No. ND 01-11549-RR  
21 [Substantively Consolidated with  
22 Former Case No. ND-01-12990-RR]  
23 Chapter 11

24 **NOTICE OF MOTION AND**  
25 **MOTION: (1) FOR MONETARY**  
26 **SANCTIONS FOR BAD FAITH**  
27 **CONDUCT, AND (2) FOR RELIEF**  
28 **PURSUANT TO BANKRUPTCY**  
**RULE 2019 AGAINST DANNING**  
**GILL DIAMOND & KOLLITZ**  
**FOR ITS FAILURE TO COMPLY**  
**WITH RULE 2019**

Date: to be determined  
Time: to be determined  
Place: Courtroom 201  
1415 State Street  
Santa Barbara, CA 93101  
[Judge Riblet]

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 16, 2003 at 10 a.m., or as soon  
3 thereafter as is counsel may be heard, before the Honorable Robin L. Riblet in  
4 Courtroom 201, the Official Committee of Unsecured Creditors will move this  
5 Court: (1) for monetary sanctions against Danning Gill Diamond & Kollitz  
6 ("Danning Gill") for bad faith conduct, and (2) for relief against Danning Gill for  
7 its failure to comply with Bankruptcy Rule 2019. This Motion is supported by this  
8 Notice; the concurrently served Memorandum of Points and Authorities,  
9 Declaration of Christopher L. Frost; Exhibits; and all pleadings, papers and other  
10 matters on file with the Court; and such other and further matters as may be  
11 presented to the Court at the time of hearing.

12 The Court-specific rules require an opposition to this Motion on or before  
13 June 2, 2003, 14 days before the date set for the hearing. The opposition must  
14 conform to Local Bankruptcy Rule 9013-1(a).

15  
16 DATED: May 19, 2003

Respectfully submitted,

17  
18 OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS

19  
20 By: 

Richard L. Wynne  
Bennett L. Spiegel  
Christopher L. Frost  
**KIRKLAND & ELLIS**  
Attorneys for Official Committee of  
Unsecured Creditors