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In the Matter of the General Assignment for the Benefit of Creditors of FLEER COLLECTIBLES, LLC, Assignor, to WARREN J. MARTIN JR., Assignee.	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION, PROBATE PART BURLINGTON COUNTY DOCKET NO: P-2005-1408

NOTICE OF MOTION FOR ORDER AUTHORIZING PAYMENT OF PROFESSIONAL FEES OF ATTORNEYS AND ACCOUNTANTS AND ASSIGNEE'S COMMISSION

TO: ALL PARTIES ON ATTACHED CORE SERVICE LIST

PLEASE TAKE NOTICE that Warren J. Martin Jr. (the "Assignee"), Assignee for the Benefit of Creditors of Fleer Collectibles, LLC ("Fleer Collectibles"), by and through his counsel, Porzio, Bromberg & Newman, P.C., shall move before the Honorable Ronald E. Bookbinder, J.S.C., a Judge of the Superior Court of the State of New Jersey, on the 10th day of November, 2005 at 2:00 p.m., or as soon thereafter as counsel may be heard at the Superior Court of New Jersey, Chancery Division, Probate Part, Burlington County, 49 Rancocas Road,

Mt. Holly, New Jersey 08060, for entry of an Order Authorizing Payment of Professional Fees of Attorneys and Accountants and Assignee's Commission.

PLEASE TAKE FURTHER NOTICE that the Assignee will rely upon the attached Application for Payment of Professional Fees of Attorneys and Accountants and Assignee's Commission (the "Motion"), together with the argument of counsel and any testimony that the Court may require on the return date of the Motion.

PLEASE TAKE FURTHER NOTICE that if you fail to oppose the Motion, the Court may enter an Order Approving the Motion without further notice to you. A proposed form of Order is submitted herewith.

DATED: October 21, 2005

PORZIO, BROMBERG & NEWMAN, P.C.

By: Elizabeth M. McKeever
Elizabeth M. McKeever (EM-9715)

Attorneys for Warren J. Martin Jr., Assignee for the Benefit of Creditors of and Fleer Collectibles, LLC

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