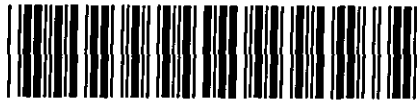


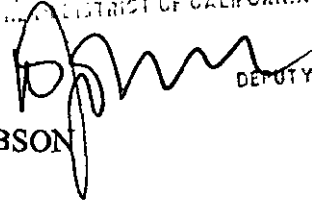
USDC SCAN INDEX SHEET



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3:02-CV-00448 SOCIETY OF LLOYDS V. BLACKWELL
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M.

ORIGINAL

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FILED
03 AUG 12 PM 4:27
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY:  DEPUTY

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16 THE SOCIETY OF LLOYD'S

17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA

BY FAX

19 THE SOCIETY OF LLOYD'S,
20
21 Plaintiff,
22
23 v.
24 ROBERT BLACKWELL, et al.,
25
26 Defendants.

27 Case No. 02-CV-0448 (AJB)
28 **EX PARTE APPLICATION FOR
ORDER ENJOINING ANY FURTHER
TRANSFER OF JUDGMENT
DEBTOR FRANK LIN'S ASSETS AND
COMPELLING FRANK LIN TO
RESPOND TO DISCOVERY,
PRODUCE DOCUMENTS AND
APPEAR AT A DEBTOR'S
EXAMINATION; MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT THEREOF FILED
CONCURRENTLY**

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
350 South Grand Avenue, Suite 3200
Los Angeles, CA 90071-3406

EX PARTE APPLICATION FOR ORDER ENJOINING ANY FURTHER TRANSFER OF JUDGMENT DEBTOR FRANK LIN'S ASSETS AND COMPELLING FRANK LIN TO RESPOND TO DISCOVERY, PRODUCE DOCUMENTS AND APPEAR AT A DEBTOR'S EXAMINATION; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF
Case No. 02 CV 0448 J (AJB)

219

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
350 South Grand Avenue, Suite 3200
Los Angeles, CA 90071-3406

1 Judgment creditor The Society of Lloyds ("Lloyd's"), through its attorney of record,
2 hereby applies for an order (1) enjoining judgment debtor Frank Lin ("Lin") and anyone
3 working in concert with him, including but not limited to his spouse Jane Lin, from
4 transferring, selling or in any manner disposing of Lin's assets that are subject to Lloyd's
5 execution, other than in the ordinary course of business or for basic living expenses, and (2)
6 compelling Lin to respond to written interrogatories, produce documents and appear for a
7 debtor's examination.


8 Good cause exists for *ex parte* relief because Lin has already fraudulently transferred
9 assets in an attempt to evade payment of the judgment entered in favor of Lloyd's and
10 against Lin in this action. The Court's order is necessary to prevent further improper
11 transfers of Lin's assets and to compel Lin to disclose relevant financial information; without
12 such information, Lloyd's cannot, *inter alia*, determine if Lin has or is fraudulently
13 conveying other assets.

14 This application is based on the declaration of Susan Chun filed herewith, the
15 memorandum of points and authorities set forth below, and the files and records in this
16 action.

17 Dated: August 12 2003

18 Respectfully submitted by:

19
20 Stephen D. Alexander
21 Susan C. Chun
22 Fried, Frank, Harris, Shriver & Jacobson

23 By: 
24 Stephen D. Alexander
25 Attorneys for Plaintiff The Society of Lloyd's

26 #85439

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28

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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.

I am employed in the county of Los Angeles, State of California. I am over the age of eighteen years, and not a party to the within action. My business address is 350 South Grand Avenue, 32nd Floor, Los Angeles, California 90071.

On August 12, 2003, I served the following documents described as *EX PARTE APPLICATION FOR ORDER ENJOINING ANY FURTHER TRANSFER OF JUDGMENT DEBTOR FRANK LIN'S ASSETS AND COMPELLING FRANK LIN TO RESPOND TO DISCOVERY, PRODUCE DOCUMENTS AND APPEAR AT A DEBTOR'S EXAMINATION* on the parties in this action by placing a true copy(ies) thereof enclosed in a sealed envelope addressed as follows:

Frank Lin
4031 Ischia Drive
Oxnard, CA 93035
805.985.4025

BY U.S. MAIL by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at the address stated above. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

(FEDERAL) I declare that I am employed in the office of a member of the bar of this court whose direction the service was made.

Executed on August 12, 2003, at Los Angeles, California.



Leticia Collier

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
350 South Grand Avenue, Suite 3200
Los Angeles, CA 90071-3406

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