

DISTRICT COURT, CITY AND
COUNTY OF DENVER, STATE
OF COLORADO

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CONSUMER CRUSADE, INC., a
Colorado corporation,

Plaintiff,

vs.

MBA FINANCIAL GROUP, INC., a
Colorado corporation; and DALE FINNEY,

Defendants.

COURT USE ONLY

Attorneys for Plaintiff:

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SUPPLEMENTAL MEMORANDUM IN RESPONSE TO
PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS

Plaintiff, Consumer Crusade, Inc., by and through its attorneys, The Demirali Law Firm
P.C., submits the following Supplemental Memorandum In Response To Defendants' Motion To
Dismiss:

1. On or about August 18, 2004, these Defendants filed their Reply in connection with their Motion To Dismiss.

2. Although most of that Reply addresses issues already raised in the case (and, therefore, responded to by the Plaintiff), a new basis for dismissal was introduced there.

3. Specifically, Defendants now seek to dismiss this action on grounds contained in an opinion by Judge Egelhoff (Denver Dist. Ct.).

4. Plaintiff has now filed a Motion To Reconsider Order, as well as a Supplemental Memorandum In Support Of Motion To Reconsider Order, which address the Judge Egelhoff decision. Consequently, those filings, appended hereto as Exhibits A and B, should be considered Plaintiff's response to the submission of the Judge Egelhoff opinion by Defendants.

WHEREFORE, Defendants' Motion To Dismiss should be denied.

DATED this 31st day of August, 2004.

/s/ A. M. Demirali
A. M. Demirali

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2004, a true and correct copy of the foregoing SUPPLEMENTAL MEMORANDUM IN RESPONSE TO DEFENDANTS' MOTION TO DISMISS was served on Defendants' counsel via electronic filing and by depositing the same in the United States mail, postage prepaid, addressed to:

Douglas A. Turner, Esq.
602 Park Point Drive, Suite 240
Golden, CO 80401

/s/ Susan L. Beck
Susan L. Beck, Legal Assistant