

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

SECURITIES EXCHANGE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.05-4057-SAC
	)	
DAVID TANNER, et al.,	)	
	)	
Defendants.	)	

**SEAFORTH MERIDIAN, LTD.’S APPLICATION FOR LEAVE TO INTERVENE**

Seaforth Meridian, Ltd. (“Seaforth”), by and through counsel, moves the court for leave to intervene by right as a “relief defendant” pursuant to Fed. R. Civ. P. 24(a) for the limited purpose of seeking relief from and defending itself with respect to the Order issued by this Court on or about August 11, 2005 (Document 84) entitled “STIPULATED ORDER GRANTING, IN PART, RECEIVER’S MOTION FOR TURNOVER OF PROPERTY and Records OF THE RECEIVERSHIP ESTATE TRANSFERRED TO Mark D. Zarubi, Diversified Partner’s Limited f/k/a Cedax limited [sic], Seaforth Meridian, Limited, and Law offices [sic] of J.B. ‘Benton’ Moore.” As set forth in greater detail in Seaforth’s memorandum in support of this motion, filed contemporaneously herewith, Seaforth claims an interest in certain assets that are the subject of this litigation and Seaforth is so situated that the disposition of this action as a practical matter impairs and impedes Seaforth’s ability to protect its interests and the interests of Seaforth’s investors. In particular, the court appointed Receiver in this litigation is attempting to take steps that will harm Seaforth and its investors by, among other things, attempting to take from Seaforth and its investors’ assets that simply are not a part of the interests the Receiver was

appointed to protect.

Respectfully submitted,

**HELDER LAW FIRM**

/s/ Jan P. Helder, Jr.

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ATTORNEY FOR  
SEAFORTH MERDIAN, LTD.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of November, 2005, this document was electronically filed with the Court, which automatically notified the following electronic filing participants:

Timothy P. Davis, Counsel for Plaintiff SEC  
Christopher M. Joseph, Counsel for Spencer Defendants  
Stephen M. Joseph, Counsel for Spencer Defendants  
Roger N. Walter, Counsel for Relief Defendant Vectra Resources, LLC  
Christopher Bebel, Counsel for Relief Defendant Vectra Resources, LLC  
Randall J. Forbes, Counsel for Relief Defendant Dynamic Environmental Solutions  
Kevin M. Fowler, Counsel for Relief Defendant Dynamic Environmental Solutions  
Robert L. Herskovits, Counsel for Defendant Tanner  
Thomas D. Haney, Counsel for Defendant Tanner

/s/ Jan P. Helder, Jr.

Attorney for Seaforth Meridian, Ltd.