

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil No. 08-5348 (ADM/JSM)

1. THOMAS JOSEPH PETTERS;
PETTERS COMPANY INC.,
PCI; PETTERS GROUP WORLDWIDE, LLC;
2. DEANNA COLEMAN aka DEANNA MUNSON;
3. ROBERT WHITE;
4. JAMES WEHMHOFF;
5. LARRY REYNOLDS dba
NATIONWIDE INTERNATIONAL
RESOURCES aka NIR;
6. MICHAEL CATAIN dba
ENCHANTED FAMILY BUYING COMPANY;
7. FRANK E. VENNES JR. dba
METRO GEM FINANCE
METRO GEM INC.,
GRACE OFFERINGS OF FLORIDA LLC,
METRO PROPERTY FINANCING, LLC,
38 E. ROBINSON, LLC,
55 E. PINE, LLC,
ORLANDO RENTAL POOL, LLC
100 PINE STREET PROPERTY, LLC.
ORANGE STREET TOWER, LLC,
CORNERSTONE RENTAL POOL, LLC,
2 SOUTH ORANGE AVENUE, LLC,
HOPE COMMONS, LLC,
METRO GOLD, INC.,

Defendants.

**MOTION TO INTERVENE FOR THE LIMITED PURPOSE OF APPEARING
AS INTERESTED PARTIES AT THE HEARING ON THE MOTION TO
AUTHORIZE RECEIVER TO SELL SHARES OF BLUESTEM BRANDS, INC.
HELD BY EBP SELECT HOLDINGS, INC. (SIC) AND RTB HOLDING, LLC**

Pursuant to Fed. R. Civ. P. 24, Thomas Hay, William Dunlap and Paul Traub (“Members”), in their capacity as members of EBP Select Holdings, LLC, move this Court for an Order granting them the right to appear and be heard as interested parties on any hearing regarding the Motion to Authorize Receiver to Sell Shares of Bluestem Brands, Inc. Held by EBP Select Holdings, Inc. (SIC) and RTB Holding, LLC and Granting Related Relief [Dkt. No. 1850] (the “Bluestem Motion”). A hearing on the Bluestem Motion is currently scheduled May 17, 2011 at 10:00 a.m. By direction of the Court, the hearing on this motion to intervene will be held at the same hearing as the Bluestem Motion.

This motion to intervene is based on all of the files and proceedings herein, including Memorandum of Members in Support of Motion to Intervene for the Limited Purpose of Appearing as Interested Parties at the Hearing on the Motion to Authorize Receiver to Sell Shares of Bluestem Brands, Inc. Held by EBP Select Holdings, Inc. (SIC) and RTB Holding, LLC.

Dated: May 10, 2011

BEST & FLANAGAN LLP

By s/ Patrick B. Hennessy
Thomas B. Heffelfinger (#004328X)
Patrick B. Hennessy (#0124412)
Cynthia L. Hegarty (#0294627)
225 South Sixth Street, Suite 4000
Minneapolis, MN 55402
(612) 339-7121

ATTORNEYS FOR THOMAS HAY,
WILLIAM DUNLAP AND PAUL
TRAUB

