



1 State of New Hampshire Banking Department

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3 In re the Matter of: ) Case No.: 07-078  
 )  
 4 State of New Hampshire Banking ) Motion to Strike  
 )  
 5 Department, ) \*Applies to Respondent Toni Ward only  
 )  
 6 Petitioner, )  
 )  
 7 and )  
 )  
 8 Southstar Funding LLC, Southstar )  
 )  
 9 Partners LLC, Peter R. Norden, [REDACTED] )  
 )  
 10 [REDACTED] Timbuktu Inc., Kirk Smith,  
 11 and Toni Ward,  
 12 Respondents

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13  
14 Joint Motion to Strike Toni Ward

15 Now comes James Shepard, Petitioner, and Michelle Canter of Franzen and  
16 Salzano on behalf of Respondent Toni Ward, and jointly move to strike Toni  
17 Ward for the above-captioned action and for cause state as follows:

- 18 1. The above captioned cause was initiated as a result of the financial
- 19 instability of Respondent Southstar Funding LLC and associated issues.
- 20 2. Upon information and belief Respondent Toni Ward's position in
- 21 Respondent Southstar Funding LLC did not provide her with a controlling
- 22 interest in the financial stability of the entity.
- 23 3. The interest of the Department in this action has been substantially
- 24 satisfied by the existing default orders and one consent order
- 25 regarding other Respondents.

