

At Special Term of the
Supreme Court of the State of
New York, County of Orange
on the ____ day of _____, 2005

Present: Hon.

Sam Sloan

Petitioner

INDEX No. 2004-7739

-against-

Beatriz Marinello, Tim Hanke, Stephen Shutt,
Elizabeth Shaughnessy, Randy Bauer, Bill Goichberg,
Kenneth M. Chadwell and United States Chess Federation,

Respondents.

ORDER TO SHOW CAUSE

Upon the annexed petition of Sam Sloan duly verified the 27th day of February 2005 and upon the original petitions and upon all of the papers and proceedings had herein, it is hereby

ORDERED, that the respondents show cause before this Court at a Special Term thereof to be held at the County Courthouse in Orange County at 255 Main Street, Goshen, NY 10924 in Room ____ on the ____ day of March, 2005 at ____ AM of that day or as soon thereafter as counsel can be heard why an order should not be made and entered herein:

1. A freeze on all the bank accounts of the USCF at Key Bank in Newburgh until a

hearing can be had.

2. A temporary restraining order and a preliminary and permanent injunction restraining and enjoining Beatriz Marinello, Tim Hanke, Steven Shutt and Elizabeth Shaughnessy from taking any actions at all with respect to the USCF until a hearing can be had. Beatriz Marinello, Tim Hanke, Steven Shutt and Elizabeth Shaughnessy may not hire employees, fire employees, buy anything, sell anything, enter into contracts, write checks or pay or receive money or do anything at all with respect to the United States Chess Federation.

3. A temporary restraining order and a preliminary and permanent injunction restraining and enjoining the United States Chess Federation or its officers or employees from doing anything to effectuate a move to Crossville, Tennessee or to anywhere else absent the order of this court.

4. An order enjoining Beatriz Marinello and Tim Hanke from signing any check or transferring any funds of the United States Chess Federation.

5. An order directing Beatriz Marinello and Elizabeth Shaughnessy to return to the USCF all expense money they have received from the USCF except for money for expenses incurred while attending regular scheduled quarterly meetings of the Executive Board.

6. An order disqualifying Michael J. Matsler or the law firm of Rider, Weiner & Frankel PC from representing the defendants herein.

7. Such other and further relief as may be deemed just and equitable.

Pending a hearing before this court, it is hereby

ORDERED

1. The USCF accounts at Key Bank in Newburgh are frozen until a hearing can be had.

2. A temporary restraining order and a preliminary and permanent injunction is hereby issued restraining and enjoining Beatriz Marinello, Tim Hanke, Steven Shutt and Elizabeth Shaughnessy from taking any actions at all with respect to the USCF until a hearing can be had. Beatriz Marinello, Tim Hanke, Steven Shutt and Elizabeth Shaughnessy may not hire employees, fire employees, buy anything, sell anything, enter into contracts, write checks or pay or receive money or do anything at all with respect to the United States Chess Federation.

3. A temporary restraining order and a preliminary and permanent injunction is hereby issued restraining and enjoining the United States Chess Federation or its officers or employees from doing anything to effectuate a move to Crossville, Tennessee or to anywhere else absent an order of this court.

4. Beatriz Marinello and Tim Hanke are hereby enjoined from signing any check or transferring any funds of the United States Chess Federation in New York State.

5. Beatriz Marinello and Tim Hanke are hereby ordered and directed to return to Key Bank in New Windsor any funds of the USCF which they may have transferred out of New York State.

6. All further actions are stayed pending a hearing on this motion.

Sufficient Cause appearing therefore, it is further

ORDERED, that Service of a Copy of this Order to Show Cause, together with a copy of the papers upon which it is granted on the law firm of Rider, Weiner & Frankel PC on or before the ____ day of _____ 2005 be deemed good and sufficient service thereof.

J. S. C.