

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO. 01-21376 CA 08

GENERAL JURISDICTION DIVISION

JOAN LIGHT, SHIRLEY EISENBERG
CAROL PRISCO, and GLORIA ZIMMER

Plaintiffs,

-vs-

SCI FUNERAL SERVICES OF FLORIDA,
INC., a Florida corporation d/b/a MENORAH
GARDENS & FUNERAL CHAPELS and
SERVICE CORPORATION
INTERNATIONAL, a Texas corporation,
MENORAH PARTNERSHIP, a
Florida General Partnership, and SHARON
GARDENS LIMITED PARTNERSHIP, a
Florida Limited Partnership,

**MOTION TO ESCROW ADDITIONAL
MONEY FOR PAYMENT OF FUTURE
COSTS AND FEES.**

Defendants.

Class counsel request that the Court Escrow two million dollars (\$2,000,000.00) for the payment of future costs and fees necessary for the administration, processing and payment of the class claims and the finalization of the settlement agreement. As grounds, Class counsel state as follows:

1. Class counsel contracted with the Garden City Group (“GCG”) to assist in the administration of the class action lawsuit on February 28, 2002.
2. GCG has advised that the estimated future administrative costs involved in coordinating the claims, providing information to the class and in processing payments to the class may require up to an additional one million dollars (\$1,000,000.00).
3. There will be other significant costs, professional fees and attorneys’ fees that will

necessarily be incurred in the successful resolution of this case. Class counsel believes that an additional one million dollars (\$1,000,000.00) should be kept in escrow for these matters.

4. The total estimated amount for the payment of future costs and fees necessary for the processing of the claims and the finalization of the settlement agreement is estimated to be two million dollars (\$2,000,000.00).

WHEREFORE class counsel request that the Court enter an order setting aside two million dollars (\$2,000,000.00) in escrow for the payment of future costs and fees necessary for the processing of the claims and the finalization of the settlement agreement. Any unused amount should be awarded to the class members.

CERTIFICATE OF SERVICE

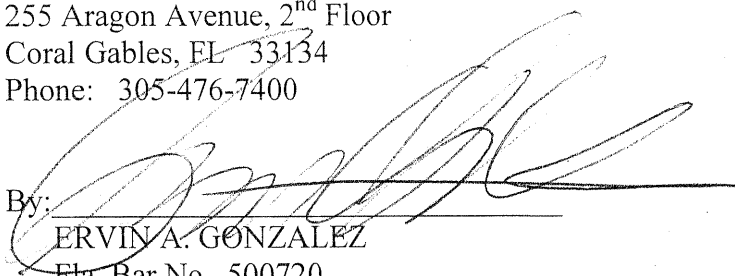
WE HEREBY CERTIFY that a true and correct copy of Plaintiffs' Memorandum in opposition to putative class member's renewed motion to intervene was sent via U.S. Mail and facsimile this 17th day of September, 2004, to: BARRY DAVIDSON, ESQUIRE, HUNTON AND WILLIAMS, Attorney for Defendants, Barclays Financial Center, Suite 2500, 1111 Brickell Avenue, Miami, Florida 33131; DENNIS O'HARA, ESQUIRE, WICKER, SMITH, O'HARA, McCOY, GRAHAM & FORD, P.A., Co-Counsel for Defendant, SCI Funeral Services of Florida, SouthTrust Tower, Suite 500, One East Broward Boulevard, Ft. Lauderdale, Florida 33302; THEODORE J. LEOPOLD, ESQ., RICCI LEOPOLD, 2925 PGA Blvd., Ste. 200, Palm Beach Gardens, FL 33410; GARY M. FARMER, JR., ESQ., FREEDLAND GLASSMAN FARMER & SHELLER, 2665 Executive Park Dr., Ste. 3, Weston, FL 33331; STEPHEN M. COHEN, ESQ., 1615 Forum Place Ste. 500, West Palm Beach, FL 33401; MITCHELL I. KITROSER, ESQ., 2215 N. Military Trail, Suite F, West Palm Beach, FL 33409; ANNA D. TORRES, ESQ., POWERS, McNALIS & TORRES, PO Box 21289, West Palm Beach, FL 33416-1289; RUTH PEERS, 51 Fairfield Road, East Brunswick, NJ 08816;

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