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*Proposed Attorneys for the Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re: : Chapter 11  
: :  
PLUSFUNDS GROUP, INC., : Case No. 06-10402 (JMP)  
a Delaware corporation, :  
: :  
Debtor. :  
-----X

**NOTICE OF FIRST DAY HEARING AND PROPOSED AGENDA**

PLEASE TAKE NOTICE that on March 6, 2006 (the "Petition Date"), PlusFunds Group, Inc. ("PFGI" or the "Debtor"), filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, as amended by the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (the "Bankruptcy Code"), in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE THAT, a hearing will be held on **March 7, 2006, at 3:00 p.m. (New York Time)**, or as soon thereafter as counsel can be heard, before the Honorable Allan L. Gropper, United States Bankruptcy Judge for the Southern District of New York, Room 617, 6th Floor, One Bowling Green, New York, New York 10004, to consider the

motions filed by the Debtor on the Petition Date that are set forth on the attached **Exhibit A** hereto.

PLEASE TAKE FURTHER NOTICE THAT for certain of the motions for which interim relief is sought, the proposed interim order for each such motion provides that unless there is a timely objection to the requested relief, the Court may grant a final order without further notice or hearing.

PLEASE TAKE FURTHER NOTICE THAT any party desiring copies of any of the documents listed on Exhibit A hereto may obtain them by written request to either Bankruptcy Services LLC, 757 Third Avenue, Third Floor, New York, NY 10017 (Attn: Cassandra Murray), or J. David Leamon, by e-mail to [dleamon@cm-p.com](mailto:dleamon@cm-p.com), or telephone at (212) 696-6936.

Dated: March 6, 2006  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ Steven J. Reisman  
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*Proposed Attorneys for the Debtor  
and Debtor-in-Possession*

**Exhibit A**

**In Re: PlusFunds Group, Inc.**

**FIRST DAY MOTIONS**

1. Motion for Order Granting Extension of Time for Debtor to File Schedules and Statements
2. \*\* Motion for Order Establishing Noticing and Service Requirements Regarding Investors
3. \*\* Motion for Order Authorizing the Debtor to Continue (I) Use of Existing Bank Accounts, Business Forms and Investment Practices, and (II) Ordinary Course Transactions with the Funds
4. \*\* Motion for Order Authorizing the Debtor to Pay Prepetition Benefits to Employees and Continue Benefit Programs in the Ordinary Course
5. Application for Authority to Retain and Appoint Bankruptcy Services LLC as Claims, Noticing and Balloting Agent for the Clerk of the Bankruptcy Court
6. Motion for Order (I) Authorizing Postpetition Financing and Granting Security Interests and Superpriority Administrative Expense Status Pursuant To 11 U.S.C. §§ 362 And 364, and (II) Scheduling Final Hearing Pursuant to Bankruptcy Rule 4001
7. \*\* Application for Order Authorizing Employment of (A) XRoads Solutions Group, LLC as Crisis Manager and (B) S. David Peress as Chief Restructuring Officer to the Debtor
8. \*\* Application by the Debtor for Entry of an Order Authorizing the Employment and Retention of Curtis, Mallet-Prevost, Colt & Mosle LLP as Attorneys for the Debtor
9. Motion for Order Scheduling Initial Case Conference

*\*\* The proposed interim order for each of these motions provides that unless there is a timely objection to the requested relief, the Court may grant a final order without further notice or hearing.*