

10/11/01

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAMES A. KNAUER as the Court Appointed)
Receiver for HEARTLAND FINANCIAL)
SERVICES, INC. and JMS INVESTMENT)
GROUP, LLC,)

CAUSE NO. IP01-1168-C T/K

Plaintiffs,)

vs.)

JONATHON ROBERTS FINANCIAL)
GROUP, INC.,)
ALLIANCE CAPITAL MANAGEMENT)
CORP.,)
ANDOVER SECURITIES, INC.,)
FSC SECURITIES CORPORATION, and)
FFP SECURITIES, INC.,)

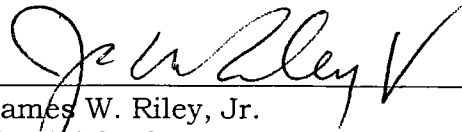
Defendants.)

JOINDER OF FFP SECURITIES, INC. IN THE MOTION TO DISMISS AND BRIEF IN SUPPORT OF JONATHON ROBERTS FINANCIAL GROUP, INC./ALLIANCE CAPITAL MANAGEMENT CORPORATION

On October 5, 2001, Defendant, FFP Securities, Inc., filed its Motion to Dismiss Plaintiff's Complaint in its entirety and Memorandum in Support, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, on the ground that Plaintiff lacks standing to assert the claims set forth therein.

On October 9, 2001, Defendants, Jonathon Roberts Financial Group, Inc. and Alliance Capital Management Corp., filed "Defendants' Roberts/Alliance Motion to Dismiss" and "Brief in Support of Their Motion to Dismiss." As further support for its own motion to dismiss Plaintiff's Complaint, Defendant, FFP Securities, Inc., joins in and adopts Defendants' Roberts/Alliance Motion to Dismiss and Brief in Support.

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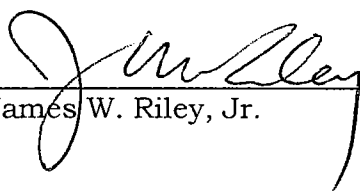
CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Joinder of FFP Securities, Inc. in the Motion to Dismiss and Brief in Support of Jonathon Roberts Financial Group, Inc./Alliance Capital Management Corporation has been served this 11th day of October, 2001, via First Class United States Mail, postage prepaid, upon:

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