

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

COMMODITY FUTURES TRADING
COMMISSION,

Plaintiff,

- against -

STEPHEN WALSH, PAUL GREENWOOD,
WESTRIDGE CAPITAL MANAGEMENT, INC.,
WG TRADING INVESTORS, LP, WGIA, LLC,

Defendants,

WESTRIDGE CAPITAL MANAGEMENT
ENHANCEMENT FUNDS INC., WG TRADING
COMPANY LP, WGI LLC, K&L
INVESTMENTS, and JANET WALSH,

Relief Defendants.

Civil Action No. 09-CV-1749 (GBD)

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

WG TRADING INVESTORS, L.P., WG
TRADING COMPANY LIMITED
PARTNERSHIP, WESTRIDGE CAPITAL
MANAGEMENT, INC., PAUL GREENWOOD
and STEPHEN WALSH

Defendants,

ROBIN GREENWOOD and JANET WALSH

Relief Defendants.

Civil Action No. 09-CV-1750 (GBD)

**NOTICE OF PROPOSED DISTRIBUTION PLAN
OF VULCAN MATERIAL COMPANY**

Pursuant to the Court's August 5, 2009 Order (CFTC Dkt. 209), Vulcan Materials Company joins the proposed distribution plan filed on behalf of Acument Global Technologies, Inc., and certain other investors (the "Noteholder Plan") insofar as it recommends that the Receiver adopt a Net Investment pro rata distribution methodology. For the reasons set forth in the Noteholder Plan and the expert report of Peter Salomon, CPA, CFF, filed simultaneously herewith (*see* Declaration of Shawn Patrick Regan, dated October 22, 2010, Ex. A), Vulcan submits that the Westridge Receivership estate should be distributed pro rata among all legitimate investors in the Ponzi scheme based upon the Net Investment distribution methodology.

Dated: New York, New York
October 22, 2010

HUNTON & WILLIAMS LLP

By: /s/ Shawn Patrick Regan
Shawn Patrick Regan
200 Park Avenue, 52nd Floor
New York, New York 10166
(212) 309-1000
sregan@hunton.com

-and-

Patrick L. Robson
HUNTON & WILLIAMS LLP
Bank of America Plaza
101 S. Tryon Street, Suite 3500
Charlotte, North Carolina 28280
(704) 378-4700
probson@hunton.com

*Attorneys for Interested Party
Vulcan Materials Company*

CERTIFICATE OF SERVICE

This is to certify that on October 22, 2010, the foregoing Notice of Proposed Distribution Plan of Vulcan Material Company, was filed electronically with the Clerk of the Court via ECF and served electronically via the ECF system on all appearing parties and counsel of record.

/s/Shawn Patrick Regan

Shawn Patrick Regan

**Declaration of Shawn Patrick Regan, dated October 22, 2010, and
the attached Exhibit A is Confidential and has been Filed Under
Seal**