

ROBB EVANS & ASSOCIATES LLC

Receiver of

AOB Commerce, Inc., et al.

11450 Sheldon Street

Sun Valley, California 91352-1121

Telephone No.: (818) 768-8100

Facsimile No.: (818) 768-8802

Securities and Exchange Commission v. AOB Commerce, Inc., et al.

CASE No. CV 07-04507 CAS (JCx)

**Reply to Nelson Liao's Response to Receiver's Motion for Instructions
Regarding Payment of Attorneys' Fees to Counsel for Defendant
Terchi Liao aka Nelson Liao**

Filed September 17, 2007

1 GARY OWEN CARIS (SBN 088918)
E-MAIL: gcaris@mckennalong.com
2 LESLEY ANNE HAWES (SBN 117101)
E-MAIL: lhawes@mckennalong.com
3 MCKENNA LONG & ALDRIDGE LLP
4 444 South Flower Street, 8th Floor
Los Angeles, CA 90071
Telephone: (213) 688-1000
5 Facsimile: (213) 243-6330

6 Attorneys for Permanent Receiver
ROBB EVANS & ASSOCIATES LLC

2007 SEP 17 PM 5:01
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES

FILED

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 v.

15 AOB COMMERCE, INC.; AOB ASIA
FUND I, LLC; and TERCHI LIAO
16 a/k/a NELSON LIAO,

17 Defendants,

18 and

19 AOB MANAGEMENT, INC.; AOB
MEDIA, INC.; AOB
20 TRANSPORTATION, INC.; and AOB
VACATIONS, INC., ,

21 Relief Defendants.

CASE NO. CV 07-04507 CAS (JCx)

**REPLY TO NELSON LIAO'S
RESPONSE TO RECEIVER'S
MOTION FOR INSTRUCTIONS
REGARDING PAYMENT OF
ATTORNEYS' FEES TO COUNSEL
FOR DEFENDANT TERCHI LIAO
AKA NELSON LIAO**

**DATE: September 24, 2007
TIME: 10:00 a.m.
CTRM: 5**

23 Receiver Robb Evans & Associates LLC ("Receiver") submits the following
24 Reply to Nelson Liao's Response to Receiver's Motion to Instructions Regarding
25 Payment of Attorneys' Fees ("Motion").

26 To put it mildly, the Receiver is stunned that, in opposition to the Receiver's
27 Motion, Liao takes the Court and the Receiver's counsel to task for failing to ask
28

1 whether attorneys' fees had already been paid to Liao's attorneys. It is not a
2 defense to material non-disclosure that someone failed to ask the question; the point
3 is that Liao and his two sets of experienced lawyers knew better than to ask for
4 attorneys' fees from the Court without disclosing that they had already received
5 \$75,000 in defense of the matter, at least \$56,000 of which was paid post-
6 receivership. It is respectfully submitted that before the Court should even consider
7 allowing more money to be paid for attorneys' fees, at a minimum the Receiver
8 should be allowed to complete its investigation in order to determine the extent to
9 which the payments already made constitute property of the receivership estate and
10 counsel for Liao must present, by competent evidence, an explanation of what
11 services have been rendered to date and what services are contemplated in the
12 future which would purportedly justify additional fees being paid.

13 Dated: September 17, 2007

MCKENNA LONG & ALDRIDGE LLP
Gary Owen Caris
Lesley Anne Hawes

14
15
16
17 By: 

Gary Owen Caris
Attorneys for Permanent Receiver
ROBB EVANS & ASSOCIATES
LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY MAIL

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the aforesaid county, State of California; I am over the age of 18 years and not a party to the within action; my business address is **444 South Flower Street, Los Angeles, California 90071.**

On September 17, 2007, I served the **REPLY TO NELSON LIAO'S RESPONSE TO RECEIVER'S MOTION FOR INSTRUCTIONS REGARDING PAYMENT OF ATTORNEYS' FEES TO COUNSEL FOR DEFENDANT TERCHI LIAO AKA NELSON LIAO** on the interested parties in this action by placing the **true copy/original** thereof, enclosed in a sealed envelope, postage prepaid, addressed as follows:

Peter F. Del Greco, Esq.
Securities and Exchange Commission
5670 Wilshire Boulevard, 11th Floor
Los Angeles, CA 90036

Robert Yaspan, Esq.
Yaspan & Thau
21700 Oxnard Street, Suite 1750
Woodland Hills, CA 91367

Tom Fang-Yao King, Esq.
150 North Santa Anita Avenue, Suite 300
Arcadia, CA 91006

I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service.

The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of such business.

- (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- (FEDERAL) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed at the office of a member of the bar of this Court at whose direction the service was made.

Executed on September 17, 2007 at Los Angeles, California.



Signature

Pamela A. Coates
Print Name