

ROBB EVANS & ASSOCIATES LLC

Receiver of the Assets of

DebtWorks, Inc., and

Andris Pukke

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Federal Trade Commission v. Ameridebt, Inc., et al.

CASE No. 8:06-MC-00012

**Receiver's Notice of Non-Opposition to Motion to Stay October 12, 2006
Memorandum Order, or in the Alternative Motion for Extension of Time
to Allow for District Court Determination of Objection and Response to
Motion to Reconsider, Modify or Set Aside Filed by John Vipulis and
Rachlin, Cohen & Holtz, LLP**

Filed November 17, 2006

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
Southern Division**

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

AMERIDEBT, *et al.*,

Defendants.

Case No. MC 06-12

**RECEIVER'S NOTICE OF NON-OPPOSITION TO MOTION TO STAY OCTOBER 12,
2006 MEMORANDUM ORDER, OR IN THE ALTERNATIVE MOTION FOR
EXTENSION OF TIME TO ALLOW FOR DISTRICT COURT DETERMINATION OF
OBJECTION AND RESPONSE TO MOTION TO RECONSIDER, MODIFY OR SET
ASIDE FILED BY JOHN VIPULIS AND RACHLIN, COHEN & HOLTZ, LLP**

Robb Evans & Associates LLC, Receiver over the assets of DebtWorks, Inc. and Andris Pukke ("Receiver"), hereby submits its notice of non-opposition to the motion for stay of Magistrate Judge Day's Memorandum Order dated October 12, 2006 or in the alternative, for an extension of time for the parties to perform under the Memorandum Order pending the District Court's determination of the Motion to Reconsider, Modify or Set Aside the Order ("Objection") filed by John Vipulis ("Vipulis") and Rachlin Cohen & Holtz, LLP ("Rachlin") and the Receiver's Opposition to the Objection to Magistrate Judge Day's Order Dated October 12, 2006 and Motion to Reconsider, Modify or Set Aside ("Receiver's Opposition").

On November 13, 2006, Vipulis filed a motion seeking to stay Magistrate Judge Day's memorandum order dated October 12, 2006 ("Stay Motion")¹ directing that Rachlin produce

¹ Counsel for Vipulis attempted to contact counsel for the Receiver, Lesley Hawes, by e-mail and voicemail sent approximately one hour prior to the time the Stay Motion was filed with the Court to ascertain the Receiver's position on the motion. As counsel for the Receiver was not in the office, counsel was unable to respond or discuss the Stay Motion prior to its filing shortly thereafter.

