

ROBB EVANS & ASSOCIATES LLC

Receiver of

**Homeland Financial Services, National Support Services, LLC, United Debt Recovery, LLC,
Freedom First Financial, LLC, Prosper Financial Solutions,
USA Debt Co, LLC, aka USADEBT.CO.COM and
Monitor of Nationwide Support Services, Inc.**

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**Federal Trade Commission v. Dennis Connelly, et al.
CASE No. SACV 06-701 DOC (RNBx)**

Notice of Hearing on Motion for Order:

- (1) Approving and Authorizing Payment of Permanent Receiver's and Monitor's Fees and Expenses, and for Approval and Payment of Fees and Expenses of Permanent Receiver's and Monitor's Professionals [October 1, 2006 Through November 30, 2006]; and**
- (2) Approving Limited Notice of Motion under Local Civil Rule 66-7**

Filed January 17, 2007

FILED

1 GARY OWEN CARIS (SBN 088918)
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6 Attorneys for Permanent Receiver and Monitor
7 ROBB EVANS and ROBB EVANS &
ASSOCIATES LLC

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

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11 FEDERAL TRADE COMMISSION,
12 Plaintiff,

13 v.

14 DENNIS CONNELLY, et al.,
15 Defendants.

CASE NO. SACV-06-701 DOC
(RNBx)

**NOTICE OF HEARING ON
MOTION FOR ORDER (1)
APPROVING AND AUTHORIZING
PAYMENT OF PERMANENT
RECEIVER'S AND MONITOR'S
FEES AND EXPENSES, AND FOR
APPROVAL AND PAYMENT OF
FEES AND EXPENSES OF
PERMANENT RECEIVER'S AND
MONITOR'S PROFESSIONALS
[OCTOBER 1, 2006 THROUGH
NOVEMBER 30, 2006]; AND (2)
APPROVING LIMITED NOTICE
OF MOTION UNDER LOCAL
CIVIL RULE 66-7**

DATE: FEBRUARY 12, 2007

TIME: 8:30 A.M.

PLACE: COURTROOM 9D

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26 PLEASE TAKE NOTICE THAT on February 12, 2007 commencing at 8:30
27 a.m. or as soon thereafter as the parties may be heard in Courtroom 9D of the
28 above-entitled Court located at 411 W. 4th Street, Santa Ana, California, Robb

1 Evans and Robb Evans & Associates LLC as Permanent Receiver (“Receiver”) of
2 Homeland Financial Services, Inc., National Support Services, Inc., United Debt
3 Recovery, LLC, and Financial Liberty Services, LLC (“Homeland Entities”),
4 Robina Capital, Inc. dba Prosper Financial Solutions (“Robina/Prosper”) and as
5 Monitor (“Monitor”) of Nationwide Support Services, Inc. (“Nationwide”) and
6 Monitor of USA Debt Co., Inc. aka USADebtCo.com and Freedom First Financial,
7 LLC (“Debtco/Freedom”) (individually and collectively for convenience herein
8 “REA”) will move the Court for an order approving the fees and expenses incurred
9 by the Receiver and Monitor and the fees and expenses of the Receiver’s and
10 Monitor’s professionals. REA seeks approval and authorization for payment of the
11 following fees and expenses incurred during the period of October 1, 2006 through
12 and including November 30, 2006 (“Second Expense Period”):

13 A. Receiver’s fees, including those of the Receiver, the Receiver’s senior
14 members and staff, of \$25,894.11 and Receiver’s expenses of \$4,155.50, and fees
15 and expenses of the Receiver’s attorneys McKenna Long & Aldridge LLP
16 (“McKenna Firm”) of \$14,142.71, pertaining to the Homeland Entities
17 receivership;

18 B. Receiver’s fees, including those of the Receiver, the Receiver’s senior
19 members and staff, of \$2,891.74 and Receiver’s expenses of \$106.80, and fees and
20 expenses of the Receiver’s attorneys, the McKenna Firm, of \$3,685.50 pertaining to
21 the Robina/Prosper receivership;

22 C. Monitor’s fees, including those of the Monitor, the Monitor’s senior
23 members and staff, of \$6,260.98 and Monitor’s expenses of \$105.61, and fees and
24 expenses of the Monitor’s attorneys, the McKenna Firm, of \$3,053.00 for services
25 pertaining to Nationwide; and


26 D. Monitor’s fees, including those of the Monitor, the Monitor’s senior
27 members and staff, of \$814.38 and Monitor’s expenses of \$8.35 pertaining to
28 Debtco/Freedom.

1 In connection with the motion for approval and payment of fees and
2 expenses, REA further seeks an order deeming REA's service of notice of this
3 motion and the motion on the parties to this action through service on their counsel
4 of record, service of notice of hearing on the motion on known unpaid vendor
5 creditors of the Receivership Entities, and REA's posting of the notice of motion
6 and motion, supporting memorandum and declarations without voluminous exhibits
7 on REA's website for this case at www.robbevans.com/html/homeland.html
8 pursuant to Local Civil Rules 66-7 and 6-1 to be sufficient and appropriate notice
9 under the circumstances.

10 This motion is made pursuant to Local Civil Rule 66-7 and is made and
11 based on this notice of motion and motion, the memorandum of points and
12 authorities and declarations of Brick Kane and Gary Owen Caris in support hereof,
13 the separate notice of hearing on the motion, on the pleadings, records and files of
14 the Court in connection with this action and on such other oral and documentary
15 evidence and arguments of counsel as may be presented by REA prior to or at the
16 hearing on the motion.

17 Dated: January 16, 2007

MCKENNA LONG & ALDRIDGE LLP
Gary Owen Caris
Lesley Anne Hawes

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21 By: 
22 Gary Owen Caris
23 Attorneys for Permanent Receiver and
24 Monitor, ROBB EVANS and ROBB
25 EVANS & ASSOCIATES LLC
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