

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.**

11450 Sheldon Street
Sun Valley, California 91352-1121
Telephone No.: (818) 768-8100
Facsimile No.: (818) 768-8802

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

Notice of Hearing on Motion and Motion for Order:

- (1) Approving and Authorizing Payment of Permanent Receiver's Fees and Expenses, and for Approval and Payment of Fees and Expenses of Permanent Receiver's Professionals [March 1, 2007 Through August 31 28, 2007]; and**
- (2) Approving Limited Notice of Motion under Local Civil Rule 66-7**

Filed November 2, 2007

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

6 Attorneys for Permanent Receiver
7 ROBB EVANS and ROBB EVANS &
ASSOCIATES LLC

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

FILED
NOV 26 11 23 AM '07
U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA, CALIFORNIA

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 AND MOTION FOR
ORDER (1) APPROVING AND
AUTHORIZING PAYMENT OF
PERMANENT RECEIVER'S FEES
AND EXPENSES, AND FOR
APPROVAL AND PAYMENT OF
FEES AND EXPENSES OF
PERMANENT RECEIVER'S
PROFESSIONALS [MARCH 1, 2007
THROUGH AUGUST 31, 2007]; AND
(2) APPROVING LIMITED NOTICE
OF MOTION UNDER LOCAL CIVIL
RULE 66-7**

DATE: November 26, 2007

TIME: 8:30 a.m.

PLACE: Courtroom 9D

24 PLEASE TAKE NOTICE THAT on November 26, 2007 commencing at
25 8:30 a.m. or as soon thereafter as the parties may be heard in Courtroom 9D of the
26 above-entitled Court located at 411 W. 4th Street, Santa Ana, California, Robb
27 Evans and Robb Evans & Associates LLC as Permanent Receiver ("Receiver") of
28

1 Homeland Financial Services, Inc., National Support Services, Inc., United Debt
2 Recovery, LLC, and Financial Liberty Services, LLC (for convenience referred to
3 herein as the "Homeland Entities") will and does hereby move the Court for an
4 order approving the fees and expenses incurred by the Receiver and the fees and
5 expenses of the Receiver's professionals. The Receiver seeks approval and
6 authorization for payment of the following fees and expenses incurred during the
7 period of March 1, 2007 through and including August 31, 2007 ("Fourth Expense
8 Period") consisting of Receiver's fees, including those of the Receiver, the
9 Receiver's senior members and staff, of \$20,322.14 and Receiver's expenses of
10 \$2,575.23, and fees and expenses of the Receiver's attorneys McKenna Long &
11 Aldridge LLP ("McKenna Firm") of \$15,478.95, pertaining to the receivership of
12 the Homeland Entities.

13 In connection with the motion for approval and payment of fees and
14 expenses, the Receiver further seeks an order deeming the Receiver's service of
15 notice of this motion and the motion on the parties to this action through service on
16 their counsel of record, service of notice of the hearing on the motion on known
17 non-consumer creditors of the Homeland Entities as well as on consumers who
18 have affirmatively contacted the Receiver for a refund, and the Receiver's posting
19 of the notice of motion and motion, supporting memorandum and declarations
20 without voluminous exhibits on the Receiver's website for this case at
21 <http://www.robbevans.com/html/homeland.html> pursuant to Local Civil Rules 66-7
22 and 6-1 to be sufficient and appropriate notice under the circumstances.


23 The motion is made pursuant to Local Civil Rule 66-7 and is made and based
24 on the notice of motion and motion, the memorandum of points and authorities and
25 declarations of Kenton Johnson and Gary Owen Caris in support hereof, this
26 separate notice of hearing on the motion, on the pleadings, records and files of the
27 Court in connection with this action and on such other oral and documentary
28

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

evidence and arguments of counsel as may be presented by the Receiver prior to or at the hearing on the motion.

Dated: November 2, 2007

McKENNA LONG & ALDRIDGE LLP
Gary Owen Caris
Lesley Anne Hawes

By: 

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