

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 for Order:

- (1) Approving Proposed Claims Filing and Allowance Procedures for Non-Consumer Creditors, Including Setting Claims Bar Date;**
- (2) Approving Proposed Pro Rata Distribution to Creditors and Proposed Procedures for and Administration of Payments and Consumer Claims; and**
- (3) Approving Limited Notice of Motion under Local Civil Rule 66-7;**

Filed November 21, 2007

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

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

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

FILED
2007 NOV 21 AM 11:21
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,
Plaintiff,
v.
DENNIS CONNELLY, et al.,
Defendants.

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

NOTICE OF HEARING ON MOTION FOR ORDER (1) APPROVING PROPOSED CLAIMS FILING AND ALLOWANCE PROCEDURES FOR NON-CONSUMER CREDITORS, INCLUDING SETTING CLAIMS BAR DATE; (2) APPROVING PROPOSED PRO RATA DISTRIBUTION TO CREDITORS AND PROPOSED PROCEDURES FOR AND ADMINISTRATION OF PAYMENTS AND CONSUMER CLAIMS; AND (3) APPROVING LIMITED NOTICE OF MOTION UNDER LOCAL CIVIL RULE 66-7

DATE: December 17, 2007
TIME: 8:30 a.m.
PLACE: Courtroom 9D

PLEASE TAKE NOTICE THAT on December 17, 2007 commencing at 8:30 a.m. or as soon thereafter as the parties may be heard in Courtroom 9D of the above-entitled Court located at 411 W. 4th Street, Santa Ana, California, a hearing will be held on the Motion for Order (1) Approving Proposed Claims Filing and Allowance Procedures for Non-Consumer Creditors, Including Setting Claims Bar



1 Date; (2) Approving Proposed Pro Rata Distribution to Creditors and Proposed
2 Procedures for and Administration of Payments and Consumer Claims; and (3)
3 Approving Limited Notice of Motion Under Local Civil Rule 66-7 (“Motion”) filed
4 by Robb Evans and Robb Evans & Associates LLC as Permanent Receiver
5 (“Receiver”) of Homeland Financial Services, Inc., National Support Services, Inc.,
6 United Debt Recovery, LLC, and Financial Liberty Services, LLC (for convenience
7 referred to herein as the “Homeland Entities”). Pursuant to the Motion, the
8 Receiver will move the Court for the following relief:

- 9 1. An order setting a claims bar date for the receipt of claims of non-
10 consumer creditors¹ by the Receiver of January 31, 2008;
- 11 2. An order approving the Receiver’s proposed claims filing and
12 allowance procedures pertaining to the claims of non-consumer creditors which are
13 detailed in the Receiver’s Motion and supporting memorandum of points and
14 authorities;
- 15 3. An order providing for receivership funds available for distribution to
16 creditors after payment of all administrative expenses of the estate to be distributed
17 pro rata among all consumer creditors and all non-consumer creditors;
- 18 4. An order providing that plaintiff Federal Trade Commission shall be
19 responsible for the implementation of a claims procedure pertaining to consumer
20 creditors of the receivership estate and for distribution of receivership funds on
21 allowed consumer claims;
- 22 5. An order authorizing and directing the Receiver to turn over to
23 plaintiff Federal Trade Commission the pro rata share of the receivership assets

24
25 _____
26 ¹ The term “non-consumer creditors” as used in this Motion shall refer to pre-
27 receivership creditors whose claims against the receivership estate are not based on
28 injury suffered as a result of the receivership entities’ providing debt or credit
counseling services to the creditor. The non-consumer creditors consist primarily
of trade or vendor creditors.

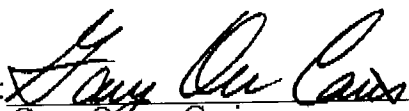
1 available for distribution to creditors that is to be distributed on allowed consumer
2 claims; and

3 6. An order deeming the Receiver's service of notice of this Motion and
4 the Motion on the parties to this action through service on their counsel of record,
5 service of this notice of the hearing on the Motion on known non-consumer
6 creditors of the Homeland Entities as well as consumers who have affirmatively
7 contacted the Receiver for a refund, and the Receiver's posting of the notice of
8 motion and Motion, supporting memorandum and declaration on the Receiver's
9 website for this case at <http://www.robbevans.com/html/homeland.html> pursuant to
10 Local Civil Rules 66-7 and 6-1 to be sufficient and appropriate notice under the
11 circumstances.

12 The Motion is made pursuant to Local Civil Rule 66-7 and is made and based
13 on the notice of motion and motion, the memorandum of points and authorities and
14 declaration of Kenton Johnson in support hereof, this separate notice of hearing on
15 the Motion, on the pleadings, records and files of the Court in connection with this
16 action and on such other oral and documentary evidence and arguments of counsel
17 as may be presented by the Receiver prior to or at the hearing on the Motion.
18

19 DATED: November 20, 2007

McKENNA LONG & ALDRIDGE LLP
GARY OWEN CARIS
LESLEY ANNE HAWES

21
22 By: 
23 Gary Owen Caris
24 Attorneys for Permanent Receiver,
25 ROBB EVANS and ROBB EVANS &
26 ASSOCIATES LLC
27
28