

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 Settlement Agreement with Nationwide Support Services, Inc.; and**
- (2) Approving Limited Notice of Motion under Local Civil Rule 66-7;**

Filed October 31, 2008

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

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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 SETTLEMENT
AGREEMENT WITH NATIONWIDE
SUPPORT SERVICES, INC.; AND (2)
APPROVING LIMITED NOTICE OF
MOTION UNDER LOCAL CIVIL
RULE 66-7**

DATE: November 24, 2008
TIME: 8:30 a.m.
PLACE: Courtroom 9D

1 PLEASE TAKE NOTICE THAT on November 24, 2008 commencing at
2 8:30 a.m. or as soon thereafter as the parties may be heard in Courtroom 9D of the
3 above-entitled Court located at 411 W. 4th Street, Santa Ana, California, Robb
4 Evans and Robb Evans & Associates LLC as Permanent Receiver (“Receiver”) of
5 Homeland Financial Services, Inc., National Support Services, Inc., United Debt
6 Recovery, LLC, and Financial Liberty Services, LLC (for convenience referred to
7 herein as the “Homeland Entities”) will move the Court for the following relief:

8 1. An order approving the Receiver’s proposed settlement agreement
9 with Nationwide Support Services, Inc. (“Nationwide”), providing for payment of
10 the sum of \$277,000 by Nationwide to the receivership estate and the retention by
11 the receivership estate of an additional \$170,462.50 in funds previously claimed by
12 Nationwide, plus all accrued interest thereon, in full settlement of all claims of the
13 receivership estate against Nationwide under that certain pre-receivership Purchase
14 Agreement between Nationwide and the receivership entity Financial Liberty
15 Services, Inc. (“FLS”). The settlement agreement with Nationwide further provides
16 for mutual releases between Nationwide and the receivership estate and resolves
17 any claims Nationwide may have against FLS under the Purchase Agreement,
18 including any claims for indemnification thereunder;

19 2. An order deeming the Receiver’s service of notice of this motion and
20 the motion on the parties to this action through service on their counsel of record,
21 service of notice of the hearing on the motion on known non-consumer creditors of
22 the Homeland Entities as well as consumers who have affirmatively contacted the
23 Receiver for a refund, and the Receiver’s posting of the notice of motion and
24 motion, supporting memorandum and declaration on the Receiver’s website for this
25 case at <http://www.robbevans.com/html/homeland.html> pursuant to Local Civil
26 Rules 66-7 and 6-1 to be sufficient and appropriate notice under the circumstances.

27 The Motion is made pursuant to Local Civil Rule 66-7 and is made and based
28 this notice of hearing, on the notice of motion and motion, the memorandum of

1 points and authorities and declaration of Kenton Johnson in support thereof on file
2 with the Court, on the pleadings, records and files of the Court in connection with
3 this action and on such other oral and documentary evidence and arguments of
4 counsel as may be presented by the Receiver prior to or at the hearing on the
5 motion.

6 PLEASE TAKE FURTHER NOTICE that a copy of the Motion and
7 supporting pleadings may be viewed on the Receiver's website for this case at
8 <http://www.robbevans.com/html/homeland.html> or a copy may be obtained upon
9 written request to the Receiver sent to: Robb Evans & Associates LLC, Attn:
10 Cherrie Eustaquio, 11450 Sheldon Street, Sun Valley, California 91352-1121;
11 Facsimile No.: (818) 768-8802.

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13 DATED: October 31, 2008

McKENNA LONG & ALDRIDGE LLP
GARY OWEN CARIS
LESLEY ANNE HAWES

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16 By: /s/ Gary Owen Caris

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