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7 Attorneys for Receiver ROBB EVANS
AND ASSOCIATES LLC
8

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **WESTERN DIVISION**

13 FEDERAL TRADE COMMISSION,
14 Plaintiff,
15 v.
16 JASON CARDIFF, etc., et al.,
17 Defendants.

Case No. 5:18-cv-02104-SJO-PLA
**NOTICE OF APPLICATION AND
APPLICATION FOR ORDER
APPROVING AND AUTHORIZING
PAYMENT OF RECEIVER’S AND
RECEIVER’S COUNSEL’S FEES
AND EXPENSES FOR THE
PERIOD FROM DECEMBER 1,
2018 THROUGH JUNE 30, 2019;
MEMORANDUM OF POINTS AND
AUTHORITIES**

[Second Fee Application; Local Rule
66-7(f)]

Date: October 7, 2019
Time: 10:00 a.m.
Place: Courtroom 10C, West 1st Street
Judge: Hon. S. James Otero

FRANZEL ROBINS BLOOM & CSATO, L.C.
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR
LOS ANGELES, CALIFORNIA 90017-2427
(323) 852-1000

1 TO: THE HONORABLE S. JAMES OTERO, UNITED STATES DISTRICT
2 JUDGE, THE PARTIES TO THIS ACTION, AND TO ALL KNOWN
3 CREDITORS AND OTHER PARTIES IN INTEREST:

4 PLEASE TAKE NOTICE that on October 7, 2019, at 10:00 a.m., or as soon
5 thereafter as the parties may be heard in Courtroom 10C of the above-entitled court
6 located at 350 West 1st Street, Tenth Floor, Los Angeles, California 90012, Robb
7 Evans & Associates LLC, as Receiver of Redwood Scientific Technologies, Inc.
8 (California), Redwood Scientific Technologies, Inc. (Nevada), Redwood Scientific
9 Technologies, Inc. (Delaware), Identify, LLC, Advance Men’s Institute Prolongz
10 LLC, Run Away Productions, LLC, Carols Place Limited Partnership, and each of
11 their subsidiaries, affiliates, successors, and assigns, and of assets of Jason Cardiff
12 and Eunjung Cardiff (collectively, the “Receivership Defendants”), will and hereby
13 does apply to the Court for an order approving the payment of the fees and expenses
14 of the Receiver, the Receiver’s staff, and the Receiver’s outside counsel, Frandzel
15 Robins Bloom & Csato, L.C., for the period from December 1, 2018 through June
16 30, 2019 (“Second Reporting Period”). During the Second Reporting Period (a) the
17 fees and costs of the Receiver and its staff totaled \$61,755.51 (consisting of
18 \$55,190.85 in fees and \$6,564.66 in costs), and (b) the fees and costs of FRBC
19 totaled \$177,450.43 (consisting of \$173,800.00 in fees and \$3,650.43 in costs), for a
20 total of \$239,205.94.¹

21 _____
22 ¹ On January 7, 2019, the Receiver filed its Application for Order Approving
23 and Authorizing Payment of Receiver’s and Receiver’s Counsel’s Fees and
24 Expenses for the Period from Inception of Receivership Estate through November
25 30, 2018 (“First Fee Application”). No party filed a written opposition to the First
26 Fee Application, and on March 14, 2019, the Court entered a Text Only Scheduling
27 Notice whereby the Court, on its own motion, took off calendar the hearing on the
28 First Fee Application and took the matter under submission. [Doc. No. 99.] As of
the date of the filing of this Application, the Court has yet to enter its ruling on the
First Fee Application filed on January 7, 2019.

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1 PLEASE TAKE FURTHER NOTICE that this Application is made pursuant
2 to Local Rule 66-7(f) and in accordance with the latest of the Court’s preliminary
3 injunctions issued in this action, namely Preliminary Injunction with Asset Freeze,
4 Receiver, and Other Equitable Relief against Jason Cardiff and Eunjung Cardiff
5 (Doc. No. 59, filed on November 8, 2018), which requires the Receiver to file with
6 the Court and serve on the parties periodic requests for the payment of reasonable
7 compensation for the Receiver’s and the Receiver’s hired personnel, including
8 counsel to the Receiver, and for actual out-of-pocket expenses incurred by them,
9 with the first such request filed no more than 60 days after the entry of said Order.
10 Further, to the extent L.R. 7-3 applies to this Application, please see the discussion
11 in the concurrently filed Declaration of Michael Gerard Fletcher regarding the
12 Receiver’s compliance with this local rule.

13 This Application is based upon this Notice and the attached Memorandum of
14 Points and Authorities; the concurrently filed Declarations of Brick Kane and
15 Michael Gerard Fletcher and exhibits thereto; upon the pleadings, records and files
16 of this case of which the Receiver requests the Court take judicial notice, and upon
17 all other further pleadings, oral and documentary evidence and argument of counsel
18 as may be presented by the Receiver at or before the time of the hearing on this
19 Application.

20 PLEASE TAKE FURTHER NOTICE that a copy of this Application and
21 supporting declarations and exhibits are posted on the Receiver’s website at
22 <https://www.robbevans.com/find-a-case/redwood-scientific-technologies-inc-et-al/>
23 where they may be reviewed in their entirety. This Application, the attached
24 Memorandum of Points and Authorities, and the concurrently filed declarations and
25 exhibits are being served on all parties herein. While a copy of this Application and
26 the attached Memorandum of Points and Authorities is being served on all known
27 creditors and interested parties (see attached Service List), these third-parties may
28 obtain copies of the supporting declarations by accessing the Receiver’s website or

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1 by sending a written request to: Robb Evans & Associates LLC, 11450 Sheldon
2 Street, Sun Valley, California 91352-1121; Telephone (818) 768-8100; Facsimile:
3 (818) 768-8802.

4 Dated: September 5, 2019 FRANDZEL ROBINS BLOOM & CSATO, L.C.
5 MICHAEL GERARD FLETCHER
6 CRAIG A. WELIN
7 HAL D. GOLDFLAM

8 By: /s/ Michael Gerard Fletcher
9 MICHAEL GERARD FLETCHER
10 Attorneys for Receiver ROBB EVANS &
11 ASSOCIATES LLC
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MEMORANDUM OF POINTS AND AUTHORITIES

I. CHRONOLOGICAL FACTS

1. On October 10, 2018, the Federal Trade Commission (“FTC”) initiated this action alleging violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a), among other alleged violations of federal laws and regulations.

2. On October 10, 2018, the Court issued its *Ex Parte* Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (“Temporary Restraining Order”), whereby the Court appointed Robb Evans & Associates LLC as the Temporary Receiver of the Receivership Entities and of the assets of Jason Cardiff and Eunjung Cardiff as more particularized therein. [Doc. No. 1.]

3. On October 24, 2018, the Court entered its Preliminary Injunction with Asset Freeze, Receiver, and Other Equitable Relief Against Redwood Scientific Technologies, Inc. (CA), etc. Appointment of a Receiver, and Other Equitable Relief, whereby the Court ordered that Robb Evans & Associates LLC shall continue to serve as the Receiver of the Receivership Entities with full powers of an equity receiver. [Doc. No. 46.]

4. On October 24, 2018, the Court entered its Order Extending Temporary Restraining Order and Granting Continuance of Preliminary Injunction Hearing for Defendant Danielle Cadiz. [Doc. No. 47.]

5. On October 24, 2018, the Court entered its Order Extending Temporary Restraining Order and Granting Continuance of Preliminary Injunction Hearing for Defendants Jason Cardiff and Eunjung Cardiff and Ordering them to Return Assets. [Doc. No. 48.]

6. On October November 1, 2018, the Receiver filed Report of Activities for the period from October 10, 2018 through October 31, 2018 (“First Report of Activities”). [Doc. No. 52; *see also* Doc. 53 Notice of Errata – whereby a readable

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1 copy of page 9 of the First Report of Activities was filed.]

2 7. On November 7, 2018, the Court entered its Stipulated Preliminary
3 Injunction as to Defendant Danielle Cadiz, whereby the Court ordered that Robb
4 Evans & Associates LLC shall continue to serve as the Receiver of the Receivership
5 Entities with full powers of an equity receiver [Doc. No. 55.]

6 8. On November 8, 2018, the Court entered its Preliminary Injunction
7 with Asset Freeze, Receiver, and Other Equitable Relief Against Jason Cardiff and
8 Eunjung Cardiff (“Preliminary Injunction”), whereby the Court ordered that Robb
9 Evans & Associates LLC shall continue to serve as the Receiver of the Receivership
10 Entities and of the Assets of Defendants Jason Cardiff and Eunjung Cardiff, as more
11 particularized therein, with full powers of an equity receiver. [Doc. No. 59.]

12 9. Pursuant to Section XXII of the Preliminary Injunction, the Court
13 ordered that:

14 “the Receiver and all personnel hired by the Receiver as
15 herein authorized, including counsel to the Receiver and
16 accountants, are entitled to reasonable compensation for
17 the performance of duties pursuant to this Order and for
18 the cost of actual out-of-pocket expenses incurred by
19 them, from the assets now held by, or in the possession or
20 control of, or which may be received by the Receivership
21 Defendants. The Receiver shall file with the Court and
22 serve on the parties periodic requests for the payment of
23 such reasonable compensation, with the first such request
24 filed no more than sixty (60) days after the date of this
25 Order.”

26 10. On January 7, 2019, the Receiver filed its Application for Order
27 Approving and Authorizing Payment of Receiver’s and Receiver’s Counsel’s Fees
28 and Expenses for the Period from Inception of Receivership Estate through

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1 November 30, 2018. (“First Fee Application”) [Doc. No. 81]. No party filed a
2 written opposition to the First Fee Application, and on March 14, 2019, the Court
3 entered a Text Only Scheduling Notice whereby the Court, on its own motion, took
4 off calendar the hearing on the First Fee Application and took the matter under
5 submission. [Doc. No. 99.] As of the date of the filing of this Second Fee
6 Application, the Court has not yet entered its ruling on the First Fee Application.

7 **II. THE RECEIVER’S AND RECEIVER’S COUNSEL’S FEES,**
8 **EXPENSES, AND ACTIVITIES DURING THE SECOND REPORTING**
9 **PERIOD**

10 During the Second Reporting Period (December 1, 2018 through June 30,
11 2019), the fees and costs of the Receiver, the Receiver’s deputies, and staff totaled
12 \$61,755.51, consisting of \$55,190.85 in fees and \$6,564.66 in costs. The legal fees
13 and costs of the Receiver’s counsel, Frandzel Robins Bloom & Csato, L.C.
14 (“FRBC”), which the Receiver hired pursuant to the authority given to the Receiver
15 in the Court’s Temporary Restraining Order at § XVI.G., and the Preliminary
16 Injunction at § XVI.G., totaled \$177,450.43, consisting of \$173,800.00 in fees and
17 \$3,650.43 in costs.² Accordingly, the total of receivership fees and expenses
18 incurred during the Second Reporting Period which the Receiver seeks an order
19 authorizing payment is \$239,205.94. (*See* Declaration of Brick Kane.)
20

21 _____
22 ² The total of FRBC’s legal fees sought by this Application total \$95.00 less
23 than the total amount of legal fees for the Second Reporting Period specified in
24 “Receivership Administrative Expense Report by Month and Fund Balance From
25 Inception (October 10, 2018) to June 30, 2019”. (Exh. 1 to the concurrently filed
26 Declaration of Brick Kane). During preparation of this Application, FRBC
27 discovered that it had inadvertently entered two separate billing entries on its
28 invoices unrelated to this matter (one for \$51.50 on its March 14, 2019 invoice, and
the other for \$43.50 on its April 17, 2019 invoice.) The Receiver will identify this
downward adjustment of FRBC’s fees in the next Receivership Administrative
Expense Report.

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1 The activities undertaken by the Receiver, the Receiver’s duties, and staff
2 during the Second Reporting Period are summarized the accompanying Declaration
3 of Brick Kane and are further detailed in the Receiver’s monthly billing summaries
4 reflecting the services rendered and time spent by the Receiver. (See Declaration of
5 Brick Kane and Exh. 2.) The activities described in the First Report of Activities
6 generally have continued during the Second Reporting Period in the context of the
7 Receiver’s efforts to identify, obtain, safeguard and preserve assets of the
8 receivership estate and otherwise to perform its duties and responsibilities under the
9 authority granted by the Temporary Restraining Order and Preliminary Injunction.
10 (Id.) FRBC assisted the Receiver during the Second Reporting Period in the manner
11 summarized in the concurrently filed Declaration of Michael Gerard Fletcher and
12 FRBC’s activities are further detailed in FRBC’s monthly billing summaries
13 reflecting the services rendered. (See Declaration of Michael Gerard Fletcher and
14 Exh. 4.)

15 The Receiver respectfully submits that in light of the work performed during
16 the First Reporting Period, the fees and costs of the Receiver and its professionals
17 are reasonable and should be approved and authorized for payment in their entirety.

18 **III. CONCLUSION**

19 Based on the foregoing and the concurrently filed Declarations of Brick Kane
20 and Michael Gerard Fletcher (and exhibits thereto), the Receiver respectfully
21 requests that the Court grant the Application and that it issue an order deeming that,
22 in light of the work performed during the Second Reporting Period, the fees and
23 costs of the Receiver and its professionals are reasonable and should be approved
24 and authorized for payment in their entirety.

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Dated: September 5, 2019

FRANDZEL ROBINS BLOOM & CSATO, L.C.
MICHAEL GERARD FLETCHER
CRAIG A. WELIN
HAL D. GOLDFLAM

By: /s/ Michael Gerard Fletcher
MICHAEL GERARD FLETCHER
Attorneys for Receiver ROBB EVANS &
ASSOCIATES LLC

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **WESTERN DIVISION**

13 FEDERAL TRADE COMMISSION,

14 Plaintiff,

15 v.

16 JASON CARDIFF, etc., et al.,

17 Defendants.
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Case No. 5:18-cv-02104-SJO-PLA

**DECLARATIONS OF BRICK
KANE AND MICHAEL GERARD
FLETCHER IN SUPPORT OF
APPLICATION FOR ORDER
APPROVING AND AUTHORIZING
PAYMENT OF RECEIVER'S AND
RECEIVER'S COUNSEL'S FEES
AND EXPENSES FOR THE
PERIOD FROM DECEMBER 1,
2018 THROUGH JUNE 30, 2019**

[Second Fee Application; Local Rule
66-7(f)]

Date: October 7, 2019

Time: 10:00 a.m.

Place: Courtroom 10C, West 1st Street

Judge: Hon. S. James Otero

DECLARATION OF BRICK KANE

I, Brick Kane, declare as follows:

1. I am the President & Chief Operating Officer of Robb Evans & Associates LLC (“REA”), initially the Temporary Receiver and subsequently the Receiver in this matter. I have personal knowledge of the matters set forth in this declaration and, if I were called upon to testify as to those matters, I could and would competently testify thereto based upon my personal knowledge.

2. I am one of the individuals with REA that has primary responsibility for the day-to-day supervision and management of the receivership estate in this case since REA first began to act as the Temporary Receiver on October 10, 2018, pursuant the its *Ex Parte* Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (“Temporary Restraining Order”).

3. On October 24, 2018, the Court entered its Preliminary Injunction with Asset Freeze, Receiver, and Other Equitable Relief Against Redwood Scientific Technologies, Inc. (CA), etc. Appointment of a Receiver, and Other Equitable Relief, whereby the Court ordered that Robb Evans & Associates LLC shall continue to serve as the Receiver of the Receivership Entities with full powers of an equity receiver. [Doc. No. 46.]

4. On October 24, 2018, the Court entered its Order Extending Temporary Restraining Order and Granting Continuance of Preliminary Injunction Hearing for Defendant Danielle Cadiz. [Doc. No. 47.]

5. On October 24, 2018, the Court entered its Order Extending Temporary Restraining Order and Granting Continuance of Preliminary Injunction Hearing for Defendants Jason Cardiff and Eunjung Cardiff and Ordering them to Return Assets. [Doc. No. 48.]

6. On November 7, 2018, the Court entered its Stipulated Preliminary

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1 Injunction as to Defendant Danielle Cadiz, whereby the Court ordered that Robb
2 Evans & Associates LLC shall continue to serve as the Receiver of the Receivership
3 Entities with full powers of an equity receiver [Doc. No. 55.]

4 7. On November 8, 2018, the Court entered its Preliminary Injunction
5 with Asset Freeze, Receiver, and Other Equitable Relief Against Jason Cardiff and
6 Eunjung Cardiff (“Preliminary Injunction”), whereby the Court ordered that Robb
7 Evans & Associates LLC shall continue to serve as the Receiver of the Receivership
8 Entities and of the Assets of Defendants Jason Cardiff and Eunjung Cardiff, as more
9 particularized therein, with full powers of an equity receiver. [Doc. No. 59.]

10 8. The activities undertaken by the Receiver’s members and staff from
11 October 10, 2018 through October 31, 2018, are specified Report of Activities for
12 the period from October 10, 2018 through October 31, 2018 (“First Report of
13 Activities”). [Doc. No. 52; *see also* Doc. 53 Notice of Errata – whereby a readable
14 copy of page 9 of the First Report of Activities was filed.]

15 9. On January 7, 2019, the Receiver filed its Application for Order
16 Approving and Authorizing Payment of Receiver’s and Receiver’s Counsel’s Fees
17 and Expenses for the Period from Inception of Receivership Estate through
18 November 30, 2018. (“First Fee Application”) [Doc. No. 81]. No party filed a
19 written opposition to the First Fee Application, and on March 14, 2019, the Court
20 entered a Text Only Scheduling Notice whereby the Court, on its own motion, took
21 off calendar the hearing on the First Fee Application and took the matter under
22 submission. [Doc. No. 99.] As of the date of the filing of this Second Fee
23 Application, the Court has not yet entered its ruling on the First Fee Application.

24 10. During the Second Reporting Period (December 1, 2018 through June
25 30, 2019), the fees and costs of the Receiver, the Receiver’s deputies, and staff
26 totaled \$61,755.51, consisting of \$55,190.85 in fees and \$6,564.66 in costs. The
27 legal fees and costs of the Receiver’s counsel, Franzel Robins Bloom & Csato,
28 L.C. (“FRBC”), which the Receiver hired pursuant to the authority given to the

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1 Receiver in the Court’s Temporary Restraining Order at § XVI.G., and the
2 Preliminary Injunction at § XVI.G., totaled \$177,450.43, consisting of \$173,800.00
3 in fees and \$3,650.43 in costs. Accordingly, the total of receivership fees
4 and expenses incurred during the First Reporting Period which the Receiver seeks
5 an order authorizing payment is \$239,205.94.¹

6 11. The Receiver’s fees and costs for which approval is requested are
7 identified in the summary which the Receiver’s office has prepared and titled as
8 “Receivership Administrative Expense Report by Month and Fund Balance From
9 Inception (October 10, 2018) to June 30, 2019,” a true and correct copy of which I
10 attach hereto as Exhibit 1. The fees are further detailed Exhibit 2 hereto.
11 Specifically, Exhibit 2 is comprised of monthly billing summaries reflecting the
12 services rendered and time spent by REA’s members, accountants, staff, and support
13 staff during the Second Reporting Period (with the work descriptions redacted
14 where appropriate to preserve information protected from disclosure by the attorney-
15 client privilege or otherwise to protect the Receiver and the receivership estate from
16 inappropriate disclosures).

17 12. I am familiar with the methods and procedures used to create, record,
18 and maintain the Receiver’s billing records. The billing records attached hereto as
19 Exhibit 2 are prepared from computerized time records prepared contemporaneously
20 with the services rendered by each professional billing time to this matter. These
21 computerized records are prepared in the ordinary course of business by the
22 Receiver’s professionals who have a business duty to accurately record their time
23 spent and services rendered on the matters on which they perform work. The time

24 _____
25 ¹ As discussed in the accompanying Declaration of Michael Gerard Fletcher,
26 the total of FRBC’s legal fees sought by this Application total \$95.00 less than the
27 total amount of legal fees for the Second Reporting Period specified in Exhibit 1
28 hereto. The Receiver will identify this downward adjustment of FRBC’s fees its
next financial report.

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1 records are transferred into a computerized billing program which generates
2 monthly invoices. In my experience, the Receiver's methods and procedures for
3 recording and accounting for time and services have proven to be reliable and
4 accurate.

5 13. The activities described in First Report of Activities generally have
6 continued through the Second Reporting Period (December 1, 2018 through June
7 30, 2019) in the context of the Receiver's efforts to identify, obtain, safeguard and
8 preserve assets of the receivership estate and otherwise to perform its duties and
9 responsibilities under the authority granted by the Temporary Restraining Order and
10 Preliminary Injunction. Moreover, while the services rendered and time spent by
11 REA's members, accountants, staff, and support staff during the Second Reporting
12 Period are summarized in the Receiver's billing summaries (Exhibit 2), such
13 services included, without limitation: (a) regularly communicating with the
14 Receiver's counsel on various legal and fact issues related to the Receiver's
15 administration of the receivership estate, including asset identification and recovery
16 issues; (b) regularly communicating with the FTC's counsel regarding receivership
17 assets, including asset identification and preservation issues; (c) reviewing and
18 responding to payment requests from pre-receivership creditors; (d) communicating
19 with banks and merchant processors regarding turnover of receivership estate assets
20 to the Receiver and account records; (e) handling pre-receivership payroll and
21 related issues for the Corporate Defendants; (f) obtaining access to safe deposit box
22 at Bank of America; (g) analyzing lien issues related to the Cardiffs' residence in
23 Upland and conferring with the Receiver's counsel regarding legal issues; (h)
24 obtaining and reviewing various bank records; (i) communicating with the property
25 manager of Corporate Defendants' offices regarding matters related to the
26 Receiver's abandonment; (j) analyzing additional asset identification and discovery
27 to be performed in cooperation with the FTC; (k) reviewing and analyzing
28 Alphatech Holdings LLC bank account documents in connection with asset

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1 investigation and discovery; (l) reviewing and monitoring communications between
2 Cardiffs' counsel and the Receiver's counsel; (m) reviewing discovery propounded
3 by FTC in connection as it relates to investigation and discovery of additional
4 receivership estate assets; (n) communicating with the IRS and California Franchise
5 Tax Board in connection with the Receiver's control over the Corporate Defendants,
6 including submitting filings and written communications as appropriate; (o) working
7 on getting the Receiver's appraisers access to the Cardiffs' Upland residence; (p)
8 reviewing pleadings and documents filed by the FTC and the Cardiffs, and
9 otherwise monitoring the ongoing litigation as it pertains to the Receiver continuing
10 to perform its duties; (q) analyzing documents and information regarding
11 manufacturing operations in Cathedral City, California, and discussions with the
12 FTC's counsel and Receiver's counsel regarding the operations and related issues.

13 14. During the Second Reporting Period, FRBC performed certain work for
14 the Receiver. That work is summarized in the accompanying Declaration of
15 Michael Gerard Fletcher and evidenced by FRBC's invoices to the Receiver
16 (Exhibit 4 thereto), which I have reviewed and approved for payment subject to the
17 Court granting this Application.

18 15. I believe that in light of the work performed during the Second
19 Reporting Period, the fees and costs of the Receiver and FRBC are reasonable and
20 should be approved and authorized for payment in their entirety.

21 16. In connection with the Application, the Receiver will comply with the
22 notice requirements of Local Rule 66-7(f) concerning applications for approval of a
23 receiver's administrative fees and expenses by serving a copy of the Notice of
24 Application and Application, the supporting Memorandum of Points and
25 Authorities, and the declarations and all exhibits on the parties to this action, and by
26 serving a copy of the Notice of Application and Application and the supporting
27 Memorandum of Points and Authorities on known creditors who are identified on
28 the Proof of Service. In addition, the Receiver will provide an entire copy of the

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1 Application, including the declarations, to anyone who requests a copy of the
2 Application in writing directed to Robb Evans & Associates LLC, 11450 Sheldon
3 Street, Sun Valley, California 91352-1121. The Receiver also will post a copy of
4 the entire Application and supporting declarations on the Receiver's website for this
5 case at [https://www.robbevans.com/find-a-case/redwood-scientific-technologies-](https://www.robbevans.com/find-a-case/redwood-scientific-technologies-inc-et-al/)
6 [inc-et-al/](https://www.robbevans.com/find-a-case/redwood-scientific-technologies-inc-et-al/).

7 17. Accordingly, the Receiver has complied with Local Rule 66-7
8 regarding notice to creditors of the Application.

9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct and that this declaration was executed
11 on September 3, 2019, at Sun Valley, California.

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14 _____
15 BRICK KANE
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FRANZEL ROBINS BLOOM & CSATO, L.C.
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR
LOS ANGELES, CALIFORNIA 90017-2427
(323) 852-1000

DECLARATION OF MICHAEL GERARD FLETCHER

I, Michael Gerard Fletcher, declare as follows:

1. I am an attorney at law duly admitted to practice before the courts of the State of California, the federal courts of the State of California, including the United States District Court for the Central District of California, and the Ninth Circuit Court of Appeals, and am a shareholder of Frandzel Robins Bloom & Csato, L.C. (“FRBC”), attorneys for the Receiver in this matter, Robb Evans & Associates LLC.

2. I am one of the attorneys primarily responsible for the representation of the Receiver in this case in addition to Craig A. Welin, who also is a shareholder of FRBC.

3. During the period of December 1, 2018 through June 30, 2019 (“Second Reporting Period”), the fees and costs of FRBC totaled \$177,450.43, consisting of \$173,800.00 in fees and \$3,650.43 in costs.

4. I attach hereto as Exhibit 3 a table that summarizes the hours worked by each attorney and paralegal during the Second Reporting Period, and their respective hourly billing rates. This table also shows the percentage of the total fees incurred by each timekeeper. As the table indicates, the work I performed during the Second Reporting period accounts for nearly 60% of all of the fees.

5. I attach hereto as Exhibit 4 the billing records for FRBC reflecting the services rendered, time spent and costs incurred by FRBC pertaining to this matter during the Second Reporting Period, with the work descriptions have redacted where appropriate to preserve information protected from disclosure by the attorney-client privilege and/or attorney work product doctrine or otherwise protect the Receiver and the receivership estate from inappropriate disclosures. These billing summaries are organized in the following manner: (a) by the following ABA Uniform Task-Based Management System Bankruptcy Code Tasks (which are most applicable to billings conducted in a federal receivership matter) – e.g., Case

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1 Administration, Asset Analysis and Recovery, Meetings of and Communications
2 with Creditors, Employee Benefits/Pensions, and Fee/Employment Applications;
3 and (b) by each attorney and paralegal under each of the referenced task codes. In
4 addition, at the end of all timekeeper entries under each task code is a table that
5 includes the hours worked by each attorney and paralegal.

6 6. I am familiar with the methods and procedures used to create, record
7 and maintain billing records for FRBC's clients. The billing records attached hereto
8 as Exhibit 4 are prepared from computerized time records prepared
9 contemporaneously with the services rendered by each attorney and paralegal billing
10 time to this matter. These computerized records are prepared in the ordinary course
11 of business by the attorneys and paralegals employed by FRBC who have a business
12 duty to accurately record their time spent and services rendered on the matters on
13 which they perform work. The time records are transferred into a computerized
14 billing program which generates monthly invoices under the supervision of the
15 firm's accounting department. Based upon my experience with FRBC, I believe the
16 firm's methods and procedures for recording and accounting for time and services
17 for its clients is reliable and accurate.²

18 7. While the legal services rendered by FRBC during the Second
19 Reporting Period, either at the direction of the Receiver or responsible attorneys
20 with this firm, are contained in the specific work entries in Exhibit 4, such services
21

22 ² The total of FRBC's legal fees sought by this Application total \$95.00 less
23 than the total amount of legal fees for the Second Reporting Period specified in
24 "Receivership Administrative Expense Report by Month and Fund Balance From
25 Inception (October 10, 2018) to June 30, 2019". (Exh. 1 hereto). During
26 preparation of this Application, we discovered that two separate billing entries on
27 our unrelated to this matter (one for \$51.50 on its March 14, 2019 invoice, and the
28 other for \$43.50 on its April 17, 2019 invoice.) The Receiver will identify this
downward adjustment of FRBC's fees in the next Receivership Administrative
Expense Report.

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1 included, without limitation: (a) regularly communicating with and advising the
2 Receiver on various legal issues related to the Receiver's administration of the
3 receivership estate, including asset identification and recovery issues; (b) assisting
4 the Receiver with legal issues related to employee benefits of former Corporate
5 Defendants' employees, including responding to the California Labor
6 Commissioner's Office regarding a wage claim; (c) reviewing discovery among the
7 parties as it relates to assets of the receivership estate; (d) attended deposition of
8 Julie Green, a former employee of the Corporate Defendants; (e) analyzing legal
9 issues surrounding potential assets and assets of the receivership estate, including
10 analysis of lien priority issues; (f) communicating with certain creditor's attorneys
11 regarding status of the receivership, and fact and legal issues; (g) preparing the
12 Receiver's First Fee Application; (h) regularly communicating with the FTC's
13 counsel and the Cardiffs' counsel, James White (who formally appeared for the
14 Cardiffs in March, 2019), related to various case administration issues, including
15 discovery, receivership asset identification and recovery, and the Cardiffs' demands
16 for the return of their U.S. Passports; (i) analyzing the Cardiff's motion for release
17 of their passports and release of funds for living allowance, and preparing the
18 Receiver's joinder to the FTC's opposition to that motion including my supporting
19 declaration and Brick Kane's supporting declaration; (j) communicating with Mr.
20 White regarding the appraisals of the Cardiffs' residence in Upland, California; (k)
21 preparing the Receiver's motion for an order granting it immediate access to the
22 Upland residence to conduct appraisals after the Cardiffs promised to provide the
23 Receiver's appraisers access but later reneged; (l) analyzing the FTC's pleadings,
24 documents, and evidence in support of the FTC's motion for an order to show cause
25 why the Cardiffs and Jacque Poujade should not be held in contempt of the Court's
26 preliminary Orders, including communications with the FTC's counsel regarding the
27 Application, preparing the Receiver's joinder to the motion, and preparing the
28 declarations of Brick Kane and Anita Jen (the Receiver's CFO) in support of the

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1 joinder as well as the Anita Jen’s supplemental declaration (m) preparing for the
2 deposition of Jacque Poujade.

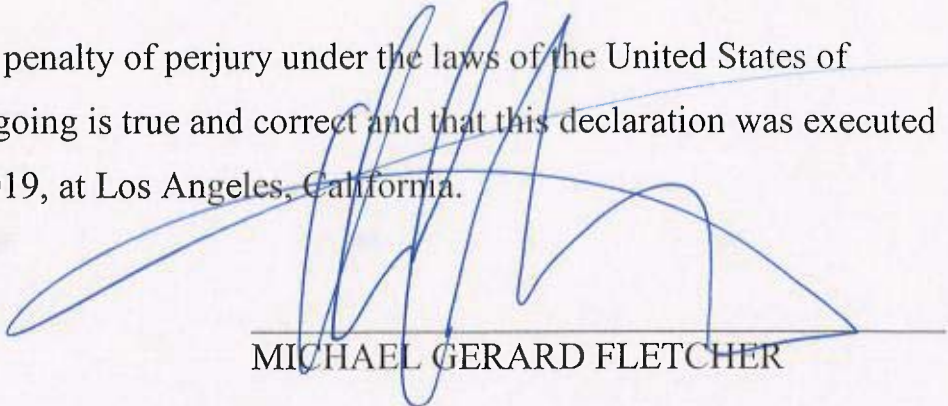
3 8. I believe that in light of the work FRBC performed during the Second
4 Reporting Period, FRBC’s fees and costs are reasonable and should be approved and
5 authorized for payment in their entirety.

6 9. It is FRBC’s understanding that in light of the Court’s requirement
7 under the Temporary Restraining Order and Preliminary Injunction that the Receiver
8 shall file with the Court and serve on the parties periodic requests for payment of the
9 Receiver’s and its professionals’ reasonable compensation, that the Receiver was
10 not required to comply with L.R. 7-3 before bringing the instant Application.
11 Further, it is our understanding that L.R. 7-3 does not apply to the Application in the
12 first instance since the Receiver represents the Court’s agent, and there is no
13 “opposing counsel” as that term is used in L.R. 7-3. Nonetheless, on June 11, 2019,
14 and on August 6, 2019, my partner, Hal D. Goldflam, communicated in writing with
15 counsel of record for Plaintiff Federal Trade Commission, Defendant Danielle
16 Cardiz, and Defendants Jason Cardiff and Eunjung Cardiff regarding the Receiver’s
17 intent to bring the instant Application. Mr. Goldflam also provided all counsel with
18 a copy of (a) the “Receivership Administrative Expense Report by Month and Fund
19 Balance From Inception (October 10, 2018) to June 30, 2019” (Exh. 1 to the
20 Declaration of Brick Kane), (b) and copies of the Receiver’s and FRBC’s respective
21 redacted invoices for the Second Reporting Period. I attach hereto collectively as
22 Exhibit 5 true and correct copies of the June 11 and August 6, 2019, written
23 communications excluding the exhibits.

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1 10. Mr. White advised us that the Cardiffs intend to oppose the Second Fee
2 Application.

3 I declare under penalty of perjury under the laws of the United States of
4 America that the foregoing is true and correct and that this declaration was executed
5 on September 5, 2019, at Los Angeles, California.



8 MICHAEL GERARD FLETCHER

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EXHIBIT 1

**Robb Evans & Associates, LLC Receiver of Redwood Scientific Technologies, Inc. et al.
 Receivership Administrative Expense Report by Month
 From Inception (October 10, 2018) to June 30, 2019**

	Previously Reported	Dec 18	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	12/1/18~ 6/30/19	TOTAL
Corporate & Defendant Assets										
Advanced Mens Institute	0.00	0.00	0.00	0.00	25,238.89	0.00	0.00	0.00	25,238.89	25,238.89
Priority Payment x26166	0.00	0.00	0.00	0.00	25,238.89	0.00	0.00	0.00	25,238.89	25,238.89
Total Advanced Mens Institute										
Carols Place Limited Partnership	213,357.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	213,357.88
Arizona B&T x2320	213,357.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	213,357.88
Total Carols Place Limited Partnership										
Identify LLC	1,264.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,264.48
Arizona B&T	1,264.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,264.48
Total Identify LLC										
Intel Property LLC	68,487.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68,487.60
First Western Bank x8915	68,487.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	68,487.60
Total Intel Property LLC										
Owl Enterprises LLC	39,677.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	39,677.73
EMS x0705	39,677.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	39,677.73
EVO Payments x1541	7,686.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,686.94
EVO Payments x0516	34,509.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	34,509.74
Humboldt Merchant Svcs x9888	0.00	11,024.51	0.00	0.00	0.00	0.00	0.00	0.00	11,024.51	11,024.51
Total Owl Enterprises LLC	81,874.41	11,024.51	0.00	0.00	0.00	0.00	0.00	0.00	11,024.51	92,898.92
People United for Christians	0.00	7,486.12	0.00	0.00	0.00	0.00	0.00	0.00	7,486.12	7,486.12
Bank of the West x7807	0.00	7,486.12	0.00	0.00	0.00	0.00	0.00	0.00	7,486.12	7,486.12
Bank of the West x8177	0.00	3,494.27	0.00	0.00	0.00	0.00	0.00	0.00	3,494.27	3,494.27
Citizen Business Bank x7443	0.00	0.00	0.00	0.00	18,730.66	0.00	0.00	0.00	18,730.66	18,730.66
Total People United for Christians	0.00	10,980.39	0.00	0.00	18,730.66	0.00	0.00	0.00	29,711.05	29,711.05
Redwood Scientific Technologies	0.00	0.00	0.00	0.00	17,513.00	0.00	0.00	0.00	17,513.00	17,513.00
Priority Payment x9990	0.00	0.00	0.00	0.00	17,513.00	0.00	0.00	0.00	17,513.00	17,513.00
EVO Payments x1969	784.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	784.17
Humboldt Merchant Svcs x0881	0.00	25,648.25	0.00	0.00	0.00	0.00	0.00	0.00	25,648.25	25,648.25
Select Bankcard x0511	0.00	0.00	78,736.23	0.00	0.00	0.00	0.00	0.00	78,736.23	78,736.23
Total Redwood Scientific Technologies	784.17	25,648.25	78,736.23	0.00	17,513.00	0.00	0.00	0.00	121,897.48	122,681.05
Smoke Stop LLC	0.00	1,786.82	0.00	0.00	0.00	0.00	0.00	0.00	1,786.82	1,786.82
Humboldt Merchant Svcs x1887	0.00	1,786.82	0.00	0.00	0.00	0.00	0.00	0.00	1,786.82	1,786.82
Total Smoke Stop LLC	0.00	1,786.82	0.00	0.00	0.00	0.00	0.00	0.00	1,786.82	1,786.82

**Robb Evans & Associates, LLC Receiver of Redwood Scientific Technologies, Inc. et al.
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 From Inception (October 10, 2018) to June 30, 2019**

	Previously Reported	Dec 18	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	12/1/18~6/30/19	TOTAL
Top Hill Shop LTD										
EVO Payments x6745	4,677.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,677.76
Total Top Hill Shop LTD	4,677.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,677.76
Cash from Defendant										
Petty Cash/Cash on Hand	6,715.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6,715.00
Proceeds from Auction	2,033.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,033.00
Worker Comp Premium Refund	0.00	0.00	16,706.09	0.00	0.00	0.00	4,180.50	0.00	20,886.59	20,886.59
Total Corporate & Defendant Assets	379,194.30	49,439.97	95,442.32	3,223.51	61,482.55	0.00	4,180.50	0.00	3,223.51	592,963.15
Interest Income										
Total Funds Collected	0.00	0.00	0.00	0.00	0.00	0.00	17.53	32.88	50.41	50.41
Expenses										
700 W 25th St. Upland, CA										
Insurance Premiums	0.00	0.00	0.00	0.00	0.00	0.00	677.26	846.58	1,523.84	1,523.84
Total 700 W 25th St. Upland, CA	0.00	0.00	0.00	0.00	0.00	0.00	677.26	846.58	1,523.84	1,523.84
Corporate Office Rent										
Payroll Expenses	0.00	0.00	0.00	0.00	2,564.78	0.00	0.00	0.00	2,564.78	2,564.78
People United for Christians										
Payroll Processing Fees	0.00	0.00	1,692.63	0.00	0.00	0.00	0.00	0.00	1,692.63	1,692.63
Total People United for Christians	0.00	0.00	1,692.63	0.00	0.00	0.00	0.00	0.00	1,692.63	1,692.63
Redwood Scientific Technologies										
Payroll Processing Fees	0.00	0.00	254.00	0.00	0.00	0.00	0.00	0.00	254.00	254.00
Total Redwood Scientific Technologies	0.00	0.00	254.00	0.00	0.00	0.00	0.00	0.00	254.00	254.00
Total Payroll Expenses	0.00	0.00	1,946.63	0.00	0.00	0.00	0.00	0.00	1,946.63	1,946.63
Receiver's Fees & Costs										
Receiver Fees										
Receiver										
B. Kane	16,005.60	513.00	1,402.20	513.00	855.00	444.60	2,359.80	1,949.40	8,037.00	24,042.60
S. Krishnan	2,736.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,736.00
K. Johnson	9,405.00	786.60	307.80	855.00	547.20	273.60	0.00	0.00	2,770.20	12,175.20
A. Jen	33,345.00	6,361.20	2,599.20	3,249.00	1,402.20	1,983.60	5,403.60	2,257.20	23,256.00	56,601.00
Total Receiver	61,491.60	7,660.80	4,309.20	4,617.00	2,804.40	2,701.80	7,763.40	4,206.60	34,063.20	95,554.80

**Robb Evans & Associates, LLC Receiver of Redwood Scientific Technologies, Inc. et al.
 Receivership Administrative Expense Report by Month
 From Inception (October 10, 2018) to June 30, 2019**

	Previously Reported	Dec 18	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	12/1/18~ 6/30/19	TOTAL
Senior Staff										
C. Callahan	4,927.50	652.50	765.00	1,215.00	2,272.50	2,520.00	3,735.00	2,047.50	13,207.50	18,135.00
F. Jen	13,989.60	0.00	0.00	60.30	0.00	60.30	0.00	60.30	180.90	14,170.50
T. Chung	17,878.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17,878.95
H. Jen	4,846.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,846.50
C. DeCius	5,212.35	1,117.80	692.55	218.70	716.85	692.55	911.25	109.35	4,459.05	9,671.40
J. Dadbin	3,766.50	162.00	421.20	186.30	97.20	891.00	534.60	315.90	2,608.20	6,374.70
Total Senior Staff	50,621.40	1,932.30	1,878.75	1,680.30	3,086.55	4,163.85	5,180.85	2,533.05	20,455.65	71,077.05
Support Staff	5,449.20	153.00	150.00	117.00	78.00	39.00	117.00	18.00	672.00	6,121.20
Total Receiver Fees	117,562.20	9,746.10	6,337.95	6,414.30	5,968.95	6,904.65	13,061.25	6,757.65	55,190.85	172,753.05
Receiver Costs										
Document Reproduction Costs	70.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	100.00	170.00
Investigative Search Costs	379.89	221.00	0.00	85.75	0.00	0.00	0.00	65.58	372.33	752.22
Locksmith Costs	1,033.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,033.96
Mileage	356.62	69.76	0.00	0.00	0.00	0.00	0.00	0.00	69.76	426.38
Moving Costs	770.32	0.00	1,870.00	0.00	0.00	0.00	0.00	0.00	1,870.00	2,640.32
Parking Fees	27.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	27.00
PO Box Rental	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	143.00
Postage & Delivery Costs	1,111.55	0.00	51.40	33.88	4.38	33.88	7.18	0.00	130.72	1,242.27
Receiver Bond Premium	143.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	143.00
Storage Unit Rent	582.67	380.00	380.00	380.00	380.00	380.00	380.00	380.00	2,660.00	3,242.67
Website & Support	26.62	1,268.70	39.92	0.00	0.00	0.00	0.00	53.23	1,361.85	1,388.47
Total Receiver Costs	4,644.63	1,939.46	2,341.32	499.63	384.38	513.88	387.18	498.81	6,564.66	11,209.29
Legal Fees & Costs										
Frاندzel Robins Bloom & Csato										
Legal Fees	55,909.00	34,920.50	13,468.50	15,366.00	23,131.00	9,301.00	38,708.00	39,000.00	173,895.00	229,804.00
Legal Costs	10,358.45	1,608.50	540.53	250.60	85.50	124.25	383.80	657.25	3,650.43	14,008.88
Total Frاندzel Robins Bloom & Csato	66,267.45	36,529.00	14,009.03	15,616.60	23,216.50	9,425.25	39,091.80	39,657.25	177,545.43	243,812.88
Total Legal Fees & Costs	66,267.45	36,529.00	14,009.03	15,616.60	23,216.50	9,425.25	39,091.80	39,657.25	177,545.43	243,812.88
Total Receiver's Fees & Costs	188,474.28	48,214.56	22,688.30	22,530.53	29,569.83	16,843.78	52,540.23	46,913.71	239,300.94	427,775.22
Total Expenses	188,474.28	48,214.56	24,634.93	22,530.53	32,134.61	16,843.78	53,217.49	47,760.29	245,336.19	433,810.47
Fund Balance	190,720.02									159,203.09