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9 Attorneys for Temporary Receiver
10 **ROBB EVANS & ASSOCIATES LLC**

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 FEDERAL TRADE COMMISSION,
14 Plaintiff,

Case No. 2:18-cv-00442-JCM-PAL

15 v.

**NOTICE OF FILING OF MOTION FOR
ORDER (1) APPROVING AND
AUTHORIZING PAYMENT OF
TEMPORARY RECEIVER’S AND
PROFESSIONALS’ FEES AND EXPENSES
FROM INCEPTION OF THE
RECEIVERSHIP THROUGH APRIL 30,
2018; AND (2) GRANTING RELIEF FROM
LOCAL RULE 66-5 PERTAINING TO
NOTICE TO CREDITORS**

16 AWS, LLC, a Nevada limited liability
17 company; ADAMS CONSULTING, LLC, a
18 California limited liability company; FBA
19 DISTRIBUTORS, LLC, a Massachusetts
20 limited liability company; FBA STORES,
21 LLC, a Nevada limited liability company;
22 GLOBAL MARKETING SERVICES
23 L.L.C., a Nevada limited liability company;
24 INFO PROS, LLC, a Nevada limited liability
25 company; ONLINE AUCTION LEARNING
26 CENTER, INC., a Massachusetts
27 corporation; ONLINE AUCTION
28 LEARNING CENTER, INC., a Nevada
corporation; CHRISTOPHER F. BOWSER,
individually and as an officer of FBA
DISTRIBUTORS, LLC, FBA STORES,
LLC, INFO SOLUTIONS, LLC, ONLINE
AUCTION LEARNING CENTER, INC. and
ONLINE AUCTION LEARNING CENTER,
INC.; ADAM S. BOWSER, individually and
as an officer of AWS, LLC, FBA
DISTRIBUTORS, LLC, FBA STORES,
LLC, INFO SOLUTIONS, LLC, ONLINE
AUCTION LEARNING CENTER, INC. and

1 ONLINE AUCTION LEARNING CENTER,
2 INC.; JODY L. MARSHALL, individually
3 and as an officer of INFO PROS, LLC and
4 INFO SOLUTIONS, LLC; and JEFFERY A.
5 GOMEZ, a/k/a JEFF ADAMS or JEFF
6 ADAM, individually and as an officer of
7 ADAMS CONSULTING, LLC and
8 GLOBAL MARKETING SERVICES
9 L.L.C.,
10 Defendants.

11 PLEASE TAKE NOTICE that Robb Evans & Associates LLC (“Receiver”), the
12 Temporary Receiver pursuant to the Court’s Temporary Restraining Order filed March 14, 2018
13 (Doc. 28) and the Stipulated Temporary Restraining Order as to Defendants Adams Consulting,
14 LLC, Global Marketing Services L.L.C., and Jeffery A. Gomez filed April 18, 2018 (Doc. 57),
15 has filed its Notice of Motion and Motion for Order (1) Approving and Authorizing Payment of
16 Temporary Receiver’s and Professional’s Fees and Expenses From the Inception of the
17 Receivership Estate Through April 30, 2018; and (2) Granting Relief From Local Rule 66-5
18 Pertaining to Notice to Creditors (“Fee Motion”). Pursuant to the Fee Motion, the Receiver
19 moves the Court for an order for the following relief:

20 1. An order approving and authorizing for payment the receivership fees and
21 expenses incurred from the inception of the receivership estate on March 14, 2018 through April
22 30, 2018 (“Initial Expense Period”), including payment of the fees of the Receiver, the Receiver’s
23 members, staff and professionals, and reimbursement of costs, comprised of: (a) Receiver’s fees,
24 including the Receiver’s members and staff, of \$232,365.90 and Receiver’s costs of \$16,594.65,
25 for a total of \$248,960.55; (b) legal fees of the Receiver’s lead counsel, Barnes & Thornburg LLP
26 (“Barnes & Thornburg”) of \$58,100.40 and Barnes & Thornburg’s costs of \$320.96, for a total of
27 \$58,421.36; and (c) legal fees of the Receiver’s local counsel, Lynch Law Practice, PLLC
28 (“Lynch”) of \$3,726.00 and Lynch’s costs of \$812.07, for a total of \$4,538.07; and

29 2. An order deeming notice of this motion to be sufficient under Local Civil Rule 66-
30 5 based on the service of the notice of the filing of this motion and the motion on all parties, and
31 the service of the notice of the filing of the motion on all known non-consumer creditors of the

1 estate concurrent with the filing of this motion with the Court, but not on the thousands of
2 potential consumer creditors of the receivership estate.

3 This Fee Motion is made pursuant to Local Civil Rules 7-2 and 66-5 and is based upon
4 this separate notice of filing of the Fee Motion, the Fee Motion, memorandum of points and
5 authorities and Declarations of Brick Kane and Gary Owen Caris in support thereof, together with
6 the exhibits accompanying the declarations, upon the pleadings, files and records of the Court in
7 this case of which the Receiver requests the Court take judicial notice, including without
8 limitation the Report of Receiver’s Activities From March 16, 2018 Through April 19, 2018
9 (“Receiver’s Report”) filed April 20, 2018 (Doc. 58), and such other and further oral and
10 documentary evidence and pleadings as may be presented by the Receiver in support of this
11 motion. A copy of the Fee Motion, without the voluminous exhibits, will be posted on the
12 Receiver’s website for this case at www.robbevans.com.

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Dated: May 30, 2018

Respectfully submitted,

MICHAEL F. LYNCH
LYNCH LAW PRACTICE, PLLC

GARY OWEN CARIS
BARNES & THORNBURG LLP

By: /s/ Gary Owen Caris
GARY OWEN CARIS

Attorneys for Temporary Receiver
ROBB EVANS & ASSOCIATES LLC