

ROBB EVANS & ASSOCIATES LLC

Receiver of the Assets of

DebtWorks, Inc., and

Andris Pukke

11450 Sheldon Street

Sun Valley, California 91352-1121

Telephone No.: (818) 768-8100

Facsimile No.: (818) 768-8802

Federal Trade Commission v. Ameridebt, Inc., et al.

CASE No. PJM 03-3317

**Reply of Media Choice, LLC to Receiver's Opposition to Motion to
Quash Subpoena or, in the Alternative, for Protective Order**

Filed July 24, 2006

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

FEDERAL TRADE COMMISSION,)
)
Plaintiff,) Civil Action No. PJM03-3317
v.)
)
AMERIDEBT, INC., *et al.*,)
)
Defendants.)
_____)

**REPLY OF MEDIA CHOICE, LLC TO RECEIVER'S
OPPOSITION TO MOTION TO QUASH SUBPOENA OR,
IN THE ALTERNATIVE, FOR PROTECTIVE ORDER**

Media Choice, LLC ("Media Choice"), by its undersigned counsel, hereby files this reply to the opposition filed by Robb Evans & Associates LLC, in its capacity as Receiver (the "Receiver") [Docket No. 486], to Media Choice's Motion to Quash Subpoena or, in the Alternative, for Protective Order (the "Motion to Quash") [Docket No. 477]. In support of this reply, Media Choice states as follows:

1. The Receiver's opposition to the Motion to Quash is a misdirection ploy. Rather than focusing on the narrow issue of whether the Receiver is entitled to obtain the confidential banking records of a non-party, the Receiver instead devotes much of the opposition to the discussion of people and transactions that have absolutely nothing to do with Media Choice or its banking records. For example, the Receiver's opposition includes discussion of such random and far-flung matters as Peter Baker's acquisition of property in Laguna Beach California (Opposition at p. 3), Andris Pukke's involvement with the activities in Belize of Sanctuary Bay Estates and Dolphin Development Company (Opposition at pp. 3 and 6), the sale of stock of an internet company called Sportingbet.plc (Opposition at p. 6) and even Andris Pukke's Maryland

divorce proceedings (Opposition at p. 6). These matters have no connection whatsoever to Media Choice or its banking records. The Receiver's discussion of these matters in the opposition is a transparent attempt to tar-and-feather Media Choice with the alleged bad acts of others.

2. The Receiver asserts that Andris Pukke's father, Janis Pukke, has testified at a deposition that he advanced \$200,000 for an equity interest in Media Choice while Stephen Todd Cook has testified that he alone (*i.e.*, Mr. Cook) is the equity owner of Media Choice. At most, this indicates that there may be a disagreement between Janis Pukke and Mr. Cook as to the identity of the owners of Media Choice. Even assuming such a disagreement exists, it would not warrant the turnover of Media Choice's confidential banking records to the Receiver.

3. In an effort to identify a smoking gun, the Receiver has submitted a document under seal which purportedly relates to a transfer of funds to Media Choice from an offshore brokerage account. Again, this document (which, to date, has not been shared with Cook or his counsel) has nothing to do with the Receiver's entitlement to Media Choice's financial records. Even assuming that Media Choice has received funds from an offshore account (or any account for that matter), this still would not warrant the turnover of Media Choice's confidential banking records to the Receiver.

4. As set forth in the Motion to Quash, Media Choice is a non-party which has no involvement in this receivership proceeding. Its legitimate privacy concerns should be protected. Given the circumstances, the type of intrusive discovery of confidential banking records sought here by the Receiver should not be permitted.

Respectfully submitted,

DATE: July 24, 2006

/s/ C. Kevin Kobbe
C. Kevin Kobbe (Bar No. 07968)
Jason W. Hardman (Bar No. 27470)
DLA PIPER RUDNICK GRAY CARY US LLP
6225 Smith Avenue
Baltimore, Maryland 21209
(410) 580-3000
Counsel for Media Choice, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 24th day of July, 2006, copies of the foregoing *Reply of Media Choice, LLC to Receiver's Opposition to Motion to Quash or, in the Alternative, for Protective Order* were sent electronically to all persons registered with CM/ECF, and by first-class mail, postage prepaid, to the following:

Gary Owen Caris, Esquire
Lesley Anne Hawes, Esquire
McKenna Long & Aldridge LLP
444 South Flower Street, 8th Floor
Los Angeles, CA 90071

Irving E. Walker, Esquire
G. David Dean, Esquire
Saul Ewing LLP
100 South Charles Street, 15th Floor
Baltimore, MD 21201

Bank of America
Subpoena Processing
Mail Code CA9-705-05-19
1000 West Temple Street, 5th Floor
Los Angeles, CA 90012

/s/ C. Kevin Kobbe
C. Kevin Kobbe