

**ROBB EVANS OF
ROBB EVANS & ASSOCIATES LLC
Receiver of I Works, Inc., et al. and
the Assets of Jeremy Johnson**

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**Federal Trade Commission v. Jeremy Johnson, I Works, Inc., et al.
CASE No. 2:10-CV-02203-RLH-GWF**

Notice of Filing of Motion for Order:

- (1) Approving and Authorizing Payment of Receiver's and Professionals' Fees and Expenses from February 1, 2012 Through May 31, 2012;
and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

Filed August 22, 2012

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 11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**
 12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 v.

18 JEREMY JOHNSON, individually, as officer
 19 of Defendants I Works, Inc., etc., et al.,

20 Defendants.

Case No. 2:10-CV-02203-MMD-GWF

**NOTICE OF FILING OF MOTION FOR
 ORDER (1) APPROVING AND
 AUTHORIZING PAYMENT OF
 RECEIVER'S AND PROFESSIONALS'
 FEES AND EXPENSES FROM
 FEBRUARY 1, 2012 THROUGH MAY 31,
 2012; AND (2) GRANTING RELIEF
 FROM LOCAL RULE 66-5
 PERTAINING TO NOTICE TO
 CREDITORS**

1 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC
2 (“Receiver”), the Receiver pursuant to the Court’s Preliminary Injunction Order issued February
3 10, 2011, has filed his Notice of Motion and Motion for Order: (1) Approving and Authorizing
4 Payment of Receiver’s and Professionals’ Fees and Expenses from February 1, 2012 Through
5 May 31, 2012; and (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors
6 (“Motion”) pursuant to which the Receiver seeks an order of the Court for the following relief:

7 1. An order approving and authorizing payment of receivership fees and expenses
8 incurred for the four-month period from February 1, 2012 through May 31, 2012 (“Expense
9 Period”), including payment of the fees of the Receiver, the Receiver’s deputies, agents, staff and
10 professionals, and reimbursement of costs incurred during the Expense Period in the total sum of
11 \$697,503.80. The fees of the Receiver, his deputies, agents and staff total \$263,821.46 and the
12 Receiver’s expenses total \$14,167.57 during the Expense Period. The Receiver’s legal fees and
13 expenses total \$419,514.77 during the Expense Period, including fees and expenses incurred to
14 the Receiver’s lead counsel McKenna Long & Aldridge LLP in the sum of \$415,716.91, fees and
15 expenses of the Receiver’s local counsel in Nevada, Kolesar & Leatham, Chtd., in the sum of
16 \$891.90, and fees and expenses of the Receiver’s special litigation counsel in Utah, Law Offices
17 of Hatch, James & Dodge, A Professional Corporation, in the sum of \$2,905.96; and

18 2. An order deeming notice of the Motion to be sufficient under Local Civil Rule 66-
19 5 based on the service of this notice of the filing of the Motion and the Motion on all parties and
20 service of this notice of the filing of the Motion on all known non-consumer creditors of the estate
21 concurrent with the filing of the Motion with the Court, but not the tens of thousands of potential
22 consumer creditors of the estate.

23 The Motion is made pursuant to Local Civil Rules 7-2 and 66-5 and is based upon this
24 separate notice of filing of the Motion, the notice of motion and motion, the memorandum of
25 points and authorities and the Declarations of Brick Kane and Gary Owen Caris filed in support
26 of the Motion, the separate Appendix of Exhibits filed in support of the Motion, any reply, upon
27 the pleadings, files and records of the Court in this case of which the Receiver requests the Court
28 take judicial notice, including without limitation the Report of Temporary Receiver’s Activities

1 filed February 8, 2011 (Doc. No. 127) and the Report of Receiver's Financial Reconstruction
2 dated January 31, 2012 and four volumes of supporting Appendices filed on February 3, 2012
3 (Doc. Nos. 464, 465-468) and upon all other pleadings and documentary evidence as may be
4 presented to the Court by the Receiver.

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6 Dated: August 22, 2012

Respectfully submitted,

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8 RANDOLPH L. HOWARD
KOLESAR & LEATHAM, CHTD.

9 MCKENNA LONG & ALDRIDGE LLP
10 GARY OWEN CARIS
LESLEY ANNE HAWES

11
12 By: /s/ Gary Owen Caris

13 Gary Owen Caris
Lesley Anne Hawes

14 Attorneys for Receiver
15 **ROBB EVANS OF ROBB EVANS &
ASSOCIATES LLC**