

**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 June 1, 2012 Through December 31, 2012;  
and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

**Filed February 26, 2012**

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Attorneys for Receiver  
11 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**  
12 **LLC**

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

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16 FEDERAL TRADE COMMISSION,  
17  
18 Plaintiff,  
19 v.  
20 JEREMY JOHNSON, individually, as officer  
of Defendants I Works, Inc., etc., et al.,  
21  
22 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 JUNE 1,  
2012 THROUGH DECEMBER 31, 2012;  
AND (2) GRANTING RELIEF FROM  
LOCAL RULE 66-5 PERTAINING TO  
NOTICE TO CREDITORS**

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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 concurrently herewith his Motion for Order: (1) Approving and Authorizing  
4 Payment of Receiver’s and Professionals’ Fees and Expenses from June 1, 2012 Through  
5 December 31, 2012; and (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to  
6 Creditors (“Motion”). Pursuant to the Motion, the Receiver moves the Court for an order for the  
7 following relief:

8 1. An order approving and authorizing payment of receivership fees and expenses  
9 incurred for the seven-month period from June 1, 2012 through December 31, 2012 (“Expense  
10 Period”), including payment of the fees of the Receiver, the Receiver’s deputies, agents, staff and  
11 professionals, and reimbursement of costs incurred during the Expense Period in the total sum of  
12 \$919,539.39. The fees of the Receiver, his deputies, agents and staff total \$307,303.47 and the  
13 Receiver’s expenses total \$58,732.94 during the Expense Period. The Receiver’s legal fees and  
14 expenses total \$553,502.98 during the Expense Period, including fees and expenses incurred to  
15 the Receiver’s lead counsel McKenna Long & Aldridge LLP in the sum of \$551,243.80, fees and  
16 expenses of the Receiver’s local counsel in Nevada, Kolesar & Leatham, Chtd., in the sum of  
17 \$2,205.86, and fees and expenses of the Receiver’s special litigation counsel in Utah, Hatch,  
18 James and Dodge in the amount of \$53.32; and

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

24 The Motion is made pursuant to Local Civil Rules 7-2 and 66-5 and is based upon this  
25 notice of filing of the Motion, the notice of motion and Motion, memorandum of points and  
26 authorities and the Declarations of Brick Kane and Gary Owen Caris in support thereof, the  
27 separate Appendix of Exhibits filed concurrently herewith in support thereof, any reply, upon the  
28 pleadings, files and records of the Court in this case of which the Receiver requests the Court take

1 judicial notice, including without limitation the Report of Temporary Receiver's Activities filed  
2 February 8, 2011 (Doc. No. 127) and the Report of Receiver's Financial Reconstruction dated  
3 January 31, 2012 and four volumes of supporting Appendices filed on February 3, 2012 (Doc.  
4 Nos. 464, 465-468) and upon all other pleadings and documentary evidence as may be presented  
5 to the Court by the Receiver.

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7 Dated: February 26, 2013

Respectfully submitted,

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RANDOLPH L. HOWARD  
KOLESAR & LEATHAM, CHTD.

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MCKENNA LONG & ALDRIDGE LLP  
GARY OWEN CARIS  
LESLEY ANNE HAWES

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By: /s/ Gary Owen Caris

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Gary Owen Caris  
Lesley Anne Hawes

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

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