

**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-MMD-GWF**

**Notice of Filing of Motion for Order:**

- (1) Approving and Authorizing Payment of Receiver's and Professionals' Fees and Expenses from January 1, 2013 Through July 31, 2013; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

**Filed September 23, 2013**

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

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

16 FEDERAL TRADE COMMISSION,  
17 Plaintiff,  
18 v.  
19 JEREMY JOHNSON, individually, as officer  
20 of Defendants I Works, Inc., etc., et al.,  
21 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 JANUARY  
1, 2013 THROUGH JULY 31, 2013; 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 Motion for Order (1) Approving and Authorizing Payment of Receiver's  
4 and Professionals' Fees and Expenses from January 1, 2013 Through July 31, 2013; and (2)  
5 Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors ("Motion"). As set forth  
6 in the Motion pursuant to which the Receiver moves the Court for an order for the following  
7 relief:

8 1. An order approving and authorizing payment of receivership fees and expenses  
9 incurred for the seven-month period from January 1, 2013 through July 31, 2013 (“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 \$1,347,126.01. The fees of the Receiver, his deputies, agents and staff total \$423,003.56 and the  
13 Receiver’s expenses total \$37,570.39 during the Expense Period. The Receiver’s legal fees and  
14 expenses total \$886,552.06 during the Expense Period, including fees of \$818,885.50 and  
15 expenses of \$58,016.07 incurred to the Receiver’s lead counsel McKenna Long & Aldridge LLP  
16 for a total of \$876,901.57, fees and expenses of the Receiver’s local counsel in Nevada, Kolesar  
17 & Leatham, Chtd., in the sum of \$1,334.48, and fees and expenses of the Receiver’s special  
18 litigation counsel in Utah, Hatch, James and Dodge in the amount of \$8,316.01; 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 this 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 filed in support of the  
27 Motion, the separate Appendix of Exhibits filed concurrently herewith in support of the Motion,  
28 any reply, upon the pleadings, files and records of the Court in this case of which the Receiver

1 requests the Court take judicial notice, including without limitation the Report of Temporary  
2 Receiver's Activities filed February 8, 2011 (Doc. No. 127) and the Report of Receiver's  
3 Financial Reconstruction dated January 31, 2012 and four volumes of supporting Appendices  
4 filed on February 3, 2012 (Doc. Nos. 464, 465-468), the Order Granting Motion for Order  
5 Clarifying Preliminary Injunction Order and for Further Instructions Regarding Scope of  
6 Receivership Defendants under Preliminary Injunction Order and Report of Receiver's Financial  
7 Reconstruction and Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors After  
8 Hearing ("Clarifying Order") entered March 25, 2013 and upon all other pleadings and  
9 documentary evidence as may be presented to the Court by the Receiver.

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Dated: September 23, 2013

Respectfully submitted,

RANDOLPH L. HOWARD  
KOLESAR & LEATHAM, CHTD.

MCKENNA LONG & ALDRIDGE LLP  
GARY OWEN CARIS  
LESLEY ANNE HAWES

By: /s/ Gary Owen Caris

Gary Owen Caris  
Lesley Anne Hawes

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