

**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 December 1, 2013 Through April 30, 2014; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

**Filed June 20, 2014**

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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.  
21  
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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  
DECEMBER 1, 2013 THROUGH APRIL  
30, 2014; AND (2) GRANTING RELIEF  
FROM LOCAL RULE 66-5 PERTAINING  
TO NOTICE TO CREDITORS**

23 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC  
24 ("Receiver"), the Receiver pursuant to the Court's Preliminary Injunction Order issued February  
25 10, 2011, has filed his Motion for Order (1) Approving and Authorizing Payment of Receiver's  
26 and Professionals' Fees and Expenses from December 1, 2013 Through April 30, 2014; and (2)  
27 Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors ("Motion"). As set forth  
28

1 in the Motion pursuant to which the Receiver moves the Court for an order for the following  
2 relief:

3 1. An order approving and authorizing payment of receivership fees and expenses  
4 incurred for the five-month period from December 1, 2013 through April 30, 2014 (“Expense  
5 Period”), including payment of the fees of the Receiver, the Receiver’s deputies, agents, staff and  
6 professionals, and reimbursement of costs incurred during the Expense Period in the total sum of  
7 \$350,026.78. The fees of the Receiver, his deputies, agents and staff total \$71,377.57 and the  
8 Receiver’s expenses total \$21,646.94 during the Expense Period. The Receiver’s legal fees and  
9 expenses total \$257,002.27 during the Expense Period, including fees of \$237,243.60 and  
10 expenses of \$15,946.46 incurred to the Receiver’s lead counsel McKenna Long & Aldridge LLP  
11 for a total of \$253,190.06, expenses of the Receiver’s local counsel in Nevada, Kolesar &  
12 Leatham, Chtd., in the sum of \$507.64, and fees in the amount of \$2,446.25 and expenses in the  
13 amount of \$858.32 for services of the Receiver’s special litigation and real estate counsel in Utah,  
14 Hatch, James & Dodge, P.C.; and

15 2. An order deeming notice of the Motion to be sufficient under Local Civil Rule 66-  
16 5 based on the service of the notice of the filing of the Motion and the Motion on all parties and  
17 service of this notice of the filing of the Motion on all known non-consumer creditors of the estate  
18 concurrent with the filing of the Motion with the Court, but not the tens of thousands of potential  
19 consumer creditors of the estate.

20 The Motion is made pursuant to Local Civil Rules 7-2 and 66-5 and is based upon this  
21 notice of filing of the Motion, the notice of motion and motion, memorandum of points and  
22 authorities and the Declarations of Brick Kane and Gary Owen Caris filed in support of the  
23 Motion, the separate Appendix of Exhibits filed concurrently herewith in support of the Motion,  
24 any reply, upon the pleadings, files and records of the Court in this case of which the Receiver  
25 requests the Court take judicial notice, including without limitation the Report of Temporary  
26 Receiver’s Activities filed February 8, 2011 (Doc. No. 127) and the Report of Receiver’s  
27 Financial Reconstruction dated January 31, 2012 and four volumes of supporting Appendices  
28 filed on February 3, 2012 (Doc. Nos. 464, 465-468), the Order Granting Motion for Order

1 Clarifying Preliminary Injunction Order and for Further Instructions Regarding Scope of  
2 Receivership Defendants under Preliminary Injunction Order and Report of Receiver's Financial  
3 Reconstruction and Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors After  
4 Hearing ("Clarifying Order") entered March 25, 2013 and upon all other pleadings and  
5 documentary evidence as may be presented to the Court by the Receiver.  
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7 Dated: June 20, 2014

Respectfully submitted,

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9 RANDOLPH L. HOWARD  
KOLESAR & LEATHAM, CHTD.

10 MCKENNA LONG & ALDRIDGE LLP  
11 GARY OWEN CARIS  
LESLEY ANNE HAWES  
12

13 By: /s/ Gary Owen Caris

14 Gary Owen Caris  
Lesley Anne Hawes

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