

**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 May 1, 2014 Through August 31, 2014; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

Filed October 8, 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

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 MAY 1,
2014 THROUGH AUGUST 31, 2014; AND
(2) GRANTING RELIEF FROM LOCAL
RULE 66-5 PERTAINING TO NOTICE TO
CREDITORS**

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24 PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC
25 ("Receiver"), the Receiver pursuant to the Court's Preliminary Injunction Order issued February
26 10, 2011, has filed his Motion for Order (1) Approving and Authorizing Payment of Receiver's
27 and Professionals' Fees and Expenses from May 1, 2014 Through August 31, 2014; and (2)

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1 Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors ("Motion"). As set forth
2 in the Motion, the Receiver moves the Court for an order for the following relief:

3 1. An order approving and authorizing payment of receivership fees and expenses
4 incurred for the four-month period from May 1, 2014 through August 31, 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 \$248,555.44. The fees of the Receiver, his deputies, agents and staff total \$59,247.04 and the
8 Receiver's expenses total \$27,338.30 during the Expense Period. The Receiver's legal fees and
9 expenses total \$161,970.10 during the Expense Period, including fees of \$147,881.70 and
10 expenses of \$13,266.45 incurred to the Receiver's lead counsel McKenna Long & Aldridge LLP
11 for a total of \$161,148.15, expenses of the Receiver's local counsel in Nevada, Kolesar &
12 Leatham, Chtd., in the sum of \$136.63, and fees in the amount of \$215.00 and expenses in the
13 amount of \$470.32 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: October 8, 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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