

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

11450 Sheldon Street
Sun Valley, California 91352-1121
Telephone No.: (818) 768-8100
Facsimile No.: (818) 768-8802

**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 Authorizing Receiver to Market and
Sell Two Castle Rock Lots Titled to Anthon Holdings Corp. and
for Related Relief Retroactive to December 9, 2014 and
Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

Filed March 12, 2015

1 RANDOLPH L. HOWARD (Nev. SBN 006688)
2 rhoward@klnevada.com
3 KOLESAR & LEATHAM, CHTD.
4 400 South Rampart Boulevard, Suite 400
5 Las Vegas, NV 89145
6 Telephone: (702) 362-7800
7 Facsimile: (702) 362-9472

8 GARY OWEN CARIS (Cal. SBN 088918)
9 gcaris@mckennalong.com
10 LESLEY ANNE HAWES (Cal. SBN 117101)
11 lhawes@mckennalong.com
12 MCKENNA LONG & ALDRIDGE LLP
13 300 South Grand Avenue, 14th Floor
14 Los Angeles, CA 90071-3124
15 Telephone: (213) 688-1000
16 Facsimile: (213) 243-6330

17 Attorneys for Receiver
18 **ROBB EVANS OF ROBB EVANS & ASSOCIATES**
19 **LLC**

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 FEDERAL TRADE COMMISSION,
23
24 Plaintiff,
25
26 v.
27 JEREMY JOHNSON, etc., et al.,
28 Defendants.

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

**NOTICE OF FILING OF MOTION FOR
ORDER AUTHORIZING RECEIVER TO
MARKET AND SELL TWO CASTLE
ROCK LOTS TITLED TO ANTHON
HOLDINGS CORP. AND FOR
RELATED RELIEF RETROACTIVE TO
DECEMBER 9, 2014, AND GRANTING
RELIEF FROM LOCAL RULE 66-5
PERTAINING TO NOTICE TO
CREDITORS**

PLEASE TAKE NOTICE that Robb Evans of Robb Evans & Associates LLC
("Receiver"), the Receiver pursuant to the Court's Preliminary Injunction Order issued February
10, 2011, has filed concurrently herewith his Motion for Order Authorizing Receiver to List and

1 Sell Two Castle Rock Lots Titled to Anthon Holdings Corp. and for Related Relief Retroactive to
2 December 9, 2014, and Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors
3 ("Motion"). Pursuant to the Motion, the Receiver moves the Court for the following relief:

4 1. An order authorizing the Receiver to list and conditionally sell, subject to Court
5 approval upon subsequent motion by the Receiver, two undeveloped lots located on Artesia Drive
6 in the Castle Rock development in the City of St. George, County of Washington, Utah,
7 consisting of Lots 105 and 166 (the "Castle Rock Lots") titled to Anthon Holdings Corp., a
8 defendant and Receivership Defendant in this case. The Receiver seeks to list and conditionally
9 sell the Castle Rock Lots pursuant to two listing agreements designated Exclusive Listing
10 Agreement and Agency Disclosure, including an Addendum and Additional Terms, with Keller
11 Williams Realty St. George and Heidi Skinner as agent (collectively "Broker") dated December 9,
12 2014 (collectively, the "Listing Agreement"), and to pay a sales commission to the Broker of 10%
13 of the gross sales price as provided for therein in connection with any subsequent sale of the
14 Castle Rock Lots approved by the Court. A true and correct copy of the Listing Agreement is
15 attached as Exhibit 1 to the Declaration of M. Val Miller in support of the Motion. The Receiver
16 further moves the Court to make the authorization effective retroactively to the date of the Listing
17 Agreement of December 9, 2014 based on the Receiver's inadvertence in entering into the Listing
18 Agreement for the Castle Rock Lots without prior Court approval, as explained in the
19 Memorandum and Declaration of M. Val Miller filed in support of the Motion; and

20 2. An order deeming notice of the Motion to be sufficient under Local Civil Rule 66-
21 5 based on the service of this Notice of Filing of the Motion and the Motion on all parties and
22 service of this Notice of Filing of the Motion on all known non-consumer creditors of the estate
23 and on all known taxing authorities with a potential claim in the receivership estate concurrent
24 with the filing of the Motion with the Court, but not on the tens of thousands of potential
25 consumer creditors.

26 The Motion is made pursuant to 28 U.S.C. § 2001 and Local Civil Rules 66-5 and 66-10
27 and other applicable law and is based upon this Notice of Filing of the Motion, the Notice of
28 Motion and Motion, Memorandum of Points and Authorities, and the Declaration of M. Val

1 Miller filed in support thereof, any reply, on all pleadings, records and files of the Court in this
2 action of which the Receiver requests judicial notice, and upon all other evidence and arguments
3 of counsel as may be presented to the Court by the Receiver in support of the Motion.
4

5 Dated: March 12, 2015

Respectfully submitted,

6 RANDOLPH L. HOWARD
7 KOLESAR & LEATHAM, CHTD.

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

11 By: /s/ Gary Owen Caris

12 Gary Owen Caris
13 Lesley Anne Hawes

14 Attorneys for Receiver
15 **ROBB EVANS OF ROBB EVANS &
16 ASSOCIATES LLC**
17
18
19
20
21
22
23
24
25
26
27
28