

**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:

- (1) Approving and Authorizing Payment of Receiver's and Professionals' Fees and Expenses from September 1, 2014 Through March 31, 2015; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

Filed April 27, 2015

1 RANDOLPH L. HOWARD (Nev. SBN 006688)
rhoward@klnevada.com
2 KOLESAR & LEATHAM, CHTD.
400 South Rampart Boulevard, Suite 400
3 Las Vegas, NV 89145
Telephone: (702) 362-7800
4 Direct: (702) 889-7752
Facsimile: (702) 362-9472

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

10 Attorneys for Receiver
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
SEPTEMBER 1, 2014 THROUGH MARCH
31, 2015; AND (2) GRANTING RELIEF
FROM LOCAL RULE 66-5 PERTAINING
TO NOTICE TO CREDITORS**

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23
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 September 1, 2014 Through March 31, 2015; and (2)

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 seven-month period from September 1, 2014 through March 31, 2015 ("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 \$276,366.05. The fees of the Receiver, his deputies, agents and staff total \$74,722.51 and the
8 Receiver's expenses total \$6,016.80 during the Expense Period. The Receiver's legal fees and
9 expenses total \$195,626.74 during the Expense Period, including fees of \$176,571.00 and
10 expenses of \$18,201.58 incurred to the Receiver's lead counsel McKenna Long & Aldridge LLP
11 for a total of \$194,772.58, legal fees of \$112.50 and expenses of \$236.16 of the Receiver's local
12 counsel in Nevada, Kolesar & Leatham, Chtd., in the total sum of \$375.66, and fees in the amount
13 of \$478.50 for services of the Receiver's special litigation and real estate counsel in Utah, Hatch,
14 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: April 27, 2015

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**