

**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 April 1, 2015 Through August 31, 2015; and**
- (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors**

Filed November 4, 2015

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12 **ROBB EVANS OF ROB EVANS &
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13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**
16

17 FEDERAL TRADE COMMISSION,
18 Plaintiff,
19 v.
20 JEREMY JOHNSON, individually, as officer
of Defendants I Works, Inc., etc., et al.,
21 Defendants.
22

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 APRIL 1,
2015 THROUGH AUGUST 31, 2015; 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 April 1, 2015 Through August 31, 2015; and
27 (2) Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors ("Motion"). As set
28 forth in the Motion, the Receiver moves the Court for an order for the following relief:

1 1. An order approving and authorizing payment of receivership fees and expenses
2 incurred for the five-month period from April 1, 2015 through August 31, 2015 (“Expense
3 Period”), including payment of the fees of the Receiver, the Receiver’s deputies, agents, staff and
4 professionals, and reimbursement of costs incurred during the Expense Period in the total sum of
5 \$192,222.65. The fees of the Receiver, his deputies, agents and staff total \$46,690.76 and the
6 Receiver’s expenses total \$24,494.53 during the Expense Period. The Receiver’s legal fees and
7 expenses total \$121,037.36 during the Expense Period, including fees of \$111,945.00 and
8 expenses of \$4,593.21 incurred to the Receiver’s lead counsel Dentons US LLP¹ for a total of
9 \$116,538.81, legal fees of \$112.50 and expenses of \$93.55 of the Receiver’s local counsel in
10 Nevada, Kolesar & Leatham, Chtd., in the total sum of \$206.05, and fees in the amount of
11 \$4,292.50 for services of the Receiver’s special real estate/title counsel in Utah, Nelson,
12 Christensen, Hollingworth & Williams; and

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

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

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27 ¹ On July 1, 2015, the Receiver's lead counsel, McKenna Long & Aldridge LLP, changed its
28 name to Dentons US LLP. See Notice of Change of Firm Name filed July 8, 2015 as Document
No. 1626.

1 on February 3, 2012 (Doc. Nos. 464, 465-468), the Order Granting Motion for Order Clarifying
2 Preliminary Injunction Order and for Further Instructions Regarding Scope of Receivership
3 Defendants under Preliminary Injunction Order and Report of Receiver's Financial Reconstruction
4 and Granting Relief from Local Rule 66-5 Pertaining to Notice to Creditors After Hearing
5 ("Clarifying Order") entered March 25, 2013 and upon all other pleadings and documentary
6 evidence as may be presented to the Court by the Receiver.

7 DATED: November 4, 2015

Respectfully submitted,

8 BART K. LARSEN
9 SHLOMO S. SHERMAN
10 KOLESAR & LEATHAM, CHTD.

11 GARY OWEN CARIS
12 LESLEY ANNE HAWES
13 DENTONS US LLP

14 By: /s/ Gary Owen Caris

15 Gary Owen Caris
16 Lesley Anne Hawes

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