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5 *Attorney for the Receiver,*
6 *Robb Evans & Associates LLC*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 SECURITIES AND EXCHANGE
10 COMMISSION,

11 Plaintiff,

12 vs.

13 EDWIN YOSHIHIRO FUJINAGA and
MRI INTERNATIONAL, INC.,

14 Defendants,

15 and

16 CSA SERVICE CENTER, LLC
THE FACTORING COMPANY,
17 JUNE FUJINAGA, and
THE YUNJU TRUST,

18 Relief Defendants.

Case No.: 2:13-cv-01658-JCM-CWH

**NOTICE OF MOTION AND
OPPORTUNITY TO OBJECT
TO THE RECEIVER’S MOTION
FOR ORDER AUTHORIZING,
DIRECTING, AND REQUIRING
RABOBANK, N.A. AND HELEN
TANG TO IMMEDIATELY TURN
OVER TO THE RECEIVER ALL
PROCEEDS FROM THE SALE OF
ONE STOP PHARMACY**

19 **NOTICE IS HEREBY GIVEN** that Robb Evans & Associates LLC, as receiver
20 (the “Receiver”) filed its *Motion for Order Authorizing, Directing, and Requiring*
21 *Rabobank, N.A. and Helen Tang to Immediately Turn Over to the Receiver All Proceeds*
22 *from the Sale of One Stop Pharmacy*, on December 20, 2017 (ECF No. 464) (the
23 “Motion”). As described and set forth in more detail in the Motion, the Receiver has
24 requested that the Court:

25 1. Enter an order directing and requiring Rabobank, N.A., to release to the
26 Receiver the balance of a checking account, with the account number ending in 5491
27 owned by One Stop Pharmacy Corporation, which balance in large part consists of
28 proceeds from the sale of One Stop Pharmacy, Inc.;

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2. Enter an order directing and requiring Helen Tang to immediately turn over to the Receiver the sum of \$164,118.04, which is the amount the Receiver alleges Ms. Tang improperly received and retained from the sale of One Stop Pharmacy Corporation; and
3. Enter an order for such additional relief as may be necessary or appropriate to allow the Receiver to recover all sums, not to exceed \$949,236.00, in connection with One Stop’s indebtedness to EBJ&F, a relief defendant herein.

NOTICE OF OPPORTUNITY TO OBJECT

PURSUANT TO LR 66-5, YOU ARE HEREBY GIVEN 14 DAYS’ NOTICE OF THIS MOTION. If no opposition, objection, and/or points and authorities in response to the Motion is filed and served within 14 days of this Notice, the Court may grant the Motion without further notice or hearing. This is your **DEADLINE** to file and serve any opposition, objection, and/or points and authorities in response to the Motion, unless such deadline is extended by the Court.¹ *See* LR 7-2(b). The failure of an opposing party to file points and authorities in response to the Motion constitutes a consent to the granting of the Motion. *See* LR 7-2(d).

It is the duty of any objecting party to timely (a) file its objection, (b) if desired, to request that its objection be set for a hearing, and (c) properly notice all parties in interest. If you do not file and serve an objection within the time permitted, an order granting the requested relief may be entered by the court without further notice or hearing.

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¹ Should you wish to verify that the Court did not change the standard 14-day deadline to respond to the Motion, you may contact the Receiver’s attorney, Michael Lynch, at Michael@LynchLawPractice.com, or by telephone at (702) 684-6000.

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NOTICE IS FURTHER GIVEN NO HEARING HAS BEEN SCHEDULED ON THE MOTION, AND IF NO OBJECTION, OPPOSITION, AND/OR POINTS AND AUTHORITIES IN SUPPORT, IS FILED WITHIN 14 DAYS OF THIS NOTICE, THAT THE MOTION MAY BE GRANTED WITHOUT A HEARING.

See LR 78-1.²

DATED December 21, 2017.

LYNCH LAW PRACTICE, PLLC

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Counsel for the Receiver,
Robb Evans & Associates LLC

² Providing, in relevant part:

All motions may be considered and decided with or without a hearing. Any party making or opposing a motion who believes oral argument may assist the court and wishes to be heard may request a hearing by inserting the words ORAL ARGUMENT REQUESTED below the title of the document on the first page of the motion or response. Parties must not file separate motions requesting a hearing.