Craig A. Welin (State Bar No. 138418) 1 cwelin@frandzel.com Michael Gerard Fletcher (State Bar No. 70849) mfletcher@frandzel.com FRANDZEL ROBINS BLOOM & CSATO, L.C. 1000 Wilshire Boulevard Nineteenth Floor Los Angeles, California 90017-2427 Telephone: (323) 852-1000 Facsimile: (323) 651-2577 6 Attorneys for Permanent Receiver ROBB 7 **EVANS & ASSOCIATES LLC** 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION 10 11 Case No. 2:15-cv-03107-PA-AJW FEDERAL TRADE COMMISSION, 12 13 Plaintiff, NOTICE OF HEARING ON MOTION FOR AN ORDER APPROVING AND AUTHORIZING 14 PAYMENT FROM RECEIVERSHIP ASSETS OF RECEIVER'S AND SALE SLASH LLC, a California RECEIVER'S COUNSEL'S FEES limited liability company; PURISTS CHOICE LLC, a California limited AND EXPENSES FOR THE PERIOD OF NOVEMBER 1, 2015, liability company; APEX CUSTOMER CARE LLC, a California limited THROUGH DECEMBER 31, 2015, 17 AND GRANTING RELATED liability company; PENWAY LLC, a **RELIEF** California limited liability company; 18 RENVEE LLC, a California limited liability company; OPTIM PRODUCTS February 29, 2016 Date: LLC, a California limited liability Time: 1:30 p.m. 20 company; EDGAR BABAYAN, Place: Courtroom 15, Spring Street individually; ARTUR BABAYAN, Judge: Hon. Percy Anderson 21 individually and as an owner and manager of SALE SLASH LLC and PURISTS CHOICE LLC; and VAHE 22 HAROUTOUNIAN, also known as VAHEH HAROUTOUNIAN, also 23 doing business as PRISMA PROFITS, individually and as manager of SALE SLASH LLC, and owner of OPTIM 24 PRODUCTS LLC, 25 Defendants. 26 27 28

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PLEASE TAKE NOTICE that on February 29, 2016, commencing at 1:30 p.m., or as soon thereafter as the parties may be heard in Courtroom 15 of the above-entitled Court located at 312 North Spring Street, Los Angeles, California 90012, Robb Evans & Associates LLC, the Permanent Receiver in the above-entitled action ("Receiver"), will and hereby does move the Court for an order (1) approving the reasonableness and authorizing the payment from receivership assets of (a) compensation and expenses for the Receiver and the Receiver's counsel Frandzel Robins Bloom & Csato, L.C. ("Frandzel") for the period of November 1, 2015, through December 31, 2015 ("Fifth Period") and (b) the Receiver's expense incurred during October 2015 consisting of Bonanza Investigations, Inc.'s \$15,130.00 invoice for investigative and surveillance services; and (2) directing the Receiver to file fee motions every 120 days rather than every 60 days pending further order of the Court.

During the Fifth Period, the Receiver's fees totaled \$4,694.60 and the Receiver's expenses totaled \$195.88, for a total of \$4,890.48. The great majority of Frandzel's fees and expenses for the Fifth Period were incurred during November 2015. Frandzel's fees and expenses totaled \$42,011.76 for November 2015 and \$10,174.28 for December 2015. During the Fifth Period, Frandzel's total fees were \$51,033.00 and Frandzel's total expenses were \$1,153.04, for a total of \$52,186.04.¹

PLEASE TAKE FURTHER NOTICE that the Motion is based upon the Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities and Declarations of Brick Kane, Craig A. Welin, and Christopher D. Crowell; the pleadings, records and files of this case of which the Receiver requests the Court take

On September 29, 2015, pursuant to the Court's Minute Order entered May 13, 2015 (Dkt. No. 34), the Receiver filed its Quarterly Task-Based Budget for the Months of September, October, November and December 2015 (Dkt. No. 96) ("Budget"). For November 2015 and December 2015, the Budget budgets \$88,194.30 in fees for the Receiver and \$55,265.00 in fees for Frandzel. Thus, the fees that are the subject of this Motion are less than the budgeted fees.

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judicial notice; this Notice of Hearing; and all other further pleadings, oral and
documentary evidence, and arguments of counsel as may be presented by the Receiver
at or before the time of the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that a copy of the Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, and Declarations of Brick Kane, Craig A. Welin, and Christopher D. Crowell (without exhibits) are and posted may be reviewed on the Receiver's website http://www.robbevans.com/find-a-case/casepage/sale-slash-LLC-et-al-receiver. Copies will be provided to any interested party upon receipt of a written request sent to Robb Evans & Associates LLC, 11450 Sheldon Street, Sun Valley, California 91352; Telephone: (818) 768-8100; Facsimile: (818) 768-8802.

PLEASE TAKE FURTHER NOTICE that this Motion is made following the conference of counsel pursuant to Local Rule 7-3, which took place via e-mail on January 20, 21, and 25, 2016.

DATED: January 27, 2016

FRANDZEL ROBINS BLOOM & CSATO, L.C. CRAIG A. WELIN MICHAEL GERARD FLETCHER

By: /s/ Craig A. Welin CRAIG A. WELIN

Attorneys for Permanent Receiver ROBB **EVANS & ASSOCIATES LLC**