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7 EVANS & ASSOCIATES LLC

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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11
12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 v.

15 SALE SLASH LLC, a California
limited liability company; PURISTS
16 CHOICE LLC, a California limited
liability company; APEX CUSTOMER
17 CARE LLC, a California limited
liability company; PENWAY LLC, a
18 California limited liability company;
RENVEE LLC, a California limited
19 liability company; OPTIM PRODUCTS
LLC, a California limited liability
20 company; EDGAR BABAYAN,
individually; ARTUR BABAYAN,
21 individually and as an owner and
manager of SALE SLASH LLC and
22 PURISTS CHOICE LLC; and VAHE
HAROUTOUNIAN, also known as
23 VAHEH HAROUTOUNIAN, also
doing business as PRISMA PROFITS,
24 individually and as manager of SALE
SLASH LLC, and owner of OPTIM
25 PRODUCTS LLC,

26 Defendants.
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Case No. 2:15-cv-03107-PA-AJW

**NOTICE OF HEARING ON
MOTION FOR AN ORDER
APPROVING AND AUTHORIZING
PAYMENT FROM RECEIVERSHIP
ASSETS OF RECEIVER'S AND
RECEIVER'S COUNSEL'S FEES
AND EXPENSES FOR THE
PERIOD OF JANUARY 1, 2016,
THROUGH MARCH 31, 2016**

Date: June 27, 2016
Time: 1:30 p.m.
Place: Courtroom 15, Spring Street
Judge: Hon. Percy Anderson

FRANZEL ROBINS BLOOM & CSATO, L.C.
1000 WILSHIRE BOULEVARD, 19TH FLOOR
LOS ANGELES, CALIFORNIA 90017-2427
(323) 852-1000

1 PLEASE TAKE NOTICE that on June 27, 2016, commencing at 1:30 p.m., or as
2 soon thereafter as the parties may be heard in Courtroom 15 of the above-entitled Court
3 located at 312 North Spring Street, Los Angeles, California 90012, Robb Evans &
4 Associates LLC, the Permanent Receiver in the above-entitled action ("Receiver"), will
5 and hereby does move the Court for an order approving the reasonableness and
6 authorizing the payment from receivership assets of compensation and expenses for the
7 Receiver and the Receiver's counsel Frandzel Robins Bloom & Csato, L.C. ("Frandzel")
8 for the period of January 1, 2016, through March 31, 2016 ("Sixth Period").

9 During the Sixth Period, the Receiver's fees totaled \$25,463.40 and the
10 Receiver's expenses totaled \$168.89, for a total of \$25,632.29. During the Sixth Period,
11 Frandzel's total fees were \$43,046.00 and Frandzel's total expenses were \$709.43, for a
12 total of \$43,755.43.¹

13 PLEASE TAKE FURTHER NOTICE that the Motion is based upon the Notice
14 of Motion and Motion; the accompanying Memorandum of Points and Authorities and
15 Declarations of Brick Kane, Craig A. Welin, and Christopher D. Crowell; the
16 pleadings, records and files of this case of which the Receiver requests the Court take
17 judicial notice; this Notice of Hearing; and all further pleadings, oral and documentary
18 evidence, and arguments of counsel as may be presented by the Receiver at or before
19 the time of the hearing on the Motion.

20 PLEASE TAKE FURTHER NOTICE that a copy of the Notice of Motion and
21 Motion, the accompanying Memorandum of Points and Authorities, and Declarations
22 of Brick Kane, Craig A. Welin, and Christopher D. Crowell (without exhibits) are
23 _____

24 ¹ On March 24, 2016, pursuant to the Court's Minute Order entered May 13,
25 2015 (Dkt. No. 34), the Receiver filed its amended Quarterly Task-Based Budget for
26 the Months of January, February, March, and April 2016 (Dkt. No. 177) ("Amended
27 Budget"). For January 2016, February 2016, and March 2016, the Amended Budget
28 estimates \$58,135.00 in fees for the Receiver and \$55,015.00 in fees for Frandzel.
Thus, the actual fees that are the subject of this Motion are less than the estimated fees.

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1 posted and may be reviewed on the Receiver's website at
2 <http://www.robbevans.com/find-a-case/casepage/sale-slash-LLC-et-al-receiver>. Copies
3 will be provided to any interested party upon receipt of a written request sent to Robb
4 Evans & Associates LLC, 11450 Sheldon Street, Sun Valley, California 91352;
5 Telephone: (818) 768-8100; Facsimile: (818) 768-8802.

6 PLEASE TAKE FURTHER NOTICE that this Motion is made following the
7 conference of counsel pursuant to Local Rule 7-3, which took place via e-mail on
8 May 19, 23, and 24, 2016. On May 19, 2016, the Receiver's counsel sent an e-mail to
9 Matthew Wernz, who represents the Plaintiff in this action, and Karl Kronenberger and
10 Ginny Sanderson, who represent the Defendants who have appeared in this action. The
11 e-mail attached copies of the Receiver's and Frandzel's invoices for the Sixth Period
12 (redacted where appropriate to preserve the attorney-client and attorney work product
13 privileges or to otherwise protect the Receiver and the estate from inappropriate
14 disclosures); indicated that the Receiver would be filing this Motion; and asked counsel
15 to advise whether they have any objection to the Motion. Mr. Wernz and Ms.
16 Sanderson each responded by e-mail and indicated that their respective clients would
17 not oppose the Motion.

18
19 DATED: May 27, 2016

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

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22 By: /s/ Craig A. Welin
CRAIG A. WELIN
23 Attorneys for Permanent Receiver ROBB
24 EVANS & ASSOCIATES LLC
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