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7 Attorneys for Receiver
 8 GEOFF WINKLER

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA
 11 WESTERN DIVISION

12 SECURITIES AND EXCHANGE
 COMMISSION,

13 Plaintiff,

14 v.

15 RALPH T. IANNELLI and ESSEX
 16 CAPITAL CORP.,

17 Defendants.

Case No. 2:18-cv-05008-FMO-AFM

NOTICE OF FIRST INTERIM
 APPLICATION OF RECEIVER, GEOFF
 WINKLER, AND ALLEN MATKINS
 LECK GAMBLE MALLORY & NATSIS
 LLP, GENERAL COUNSEL TO THE
 RECEIVER, FOR PAYMENT OF FEES
 AND REIMBURSEMENT OF EXPENSES
 OF RECEIVER
 [December 21, 2018 - March 31, 2019]

[First Interim Application; Memorandum of
 Points and Authorities; Declaration of Geoff
 Winkler; and [Proposed] Order submitted
 concurrently herewith]

Date: May 30, 2019
 Time: 10:00 a.m.
 Ctrm: 6D
 Judge Hon. Fernando M. Olguin

1 **PLEASE TAKE NOTICE THAT** on May 30, 2019, or as soon thereafter as this
 2 matter may be heard in Courtroom 6D of the above-captioned Court, located at 350 W. 1st
 3 Street, 6th Floor, Los Angeles, CA 90012, Geoff Winkler (the "Receiver"), the Court-
 4 appointed permanent receiver for Defendant Essex Capital Corporation and its subsidiaries
 5 and affiliates (collectively, the "Receivership Entities"), along with his counsel of record,
 6 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins" or "Professionals"),
 7 will and hereby do submit their collective First Interim Application for Payment of Fees
 8 and Reimbursement of Expenses (the "Application").

9 The Application has been submitted concurrently herewith. Pursuant to the
 10 Application, the Receiver and his Professionals seek approval and partial payment of their
 11 respective fees and expenses¹ for the period from December 21, 2018 through March 31,
 12 2019, as follows:

<u>Applicant</u>	<u>Fees</u>	<u>Expenses</u>	<u>Total Amount</u>
Receiver	\$363,747.70	\$10,445.10	\$374,192.80
Allen Matkins	\$155,166.75	\$3,882.63	\$159,049.38
<u>Total</u>	\$518,914.45	\$14,327.73	\$533,242.18

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 18 The Application is based on this Notice of Application, as well as the concurrently
 19 filed and supporting Memorandum of Points and Authorities, and the Declaration of Geoff
 20 Winkler, along with any argument or evidence presented to the Court at the hearing of the
 21 Application.

22 Any interested parties who wish to review the Application may do so by accessing
 23 the Receiver's website at www.essex-receivership.com or by accessing the Application via
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 1 The Receiver and Allen Matkins request payment of their fees, on an interim basis, at a reduced percentage of 80%, with the remaining "holdback" subject to payment at the time of the Receiver's and Allen Matkins' submission of their final fee applications in this matter. Accordingly, by the Application, the Receiver requests that the Court authorize interim payment of his fees and expenses in the amounts of \$290,998.16 and \$10,445.10, respectively, and Allen Matkins' fees and expenses in the amounts of \$124,133.40 and \$3,882.63, respectively.

1 the United States District Court's PACER (Public Access to Court Electronic Records)
2 system (account required) at www.pacer.gov.

3 **Procedural Requirement: If you oppose the Application, you are required to**
4 **file your written opposition with the Office of the Clerk, United States District Court,**
5 **255 East Temple Street, Los Angeles, CA 90012-4701, and serve the same on the**
6 **undersigned not later than twenty-one (21) days prior to the above-referenced**
7 **hearing date.**

8
9 Dated: April 30, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO
JOSHUA A. DEL CASTILLO
NORMAN M. ASPIS

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12 By: /s/ Joshua A. del Castillo

JOSHUA A. DEL CASTILLO
Attorneys for Receiver
GEOFF WINKLER

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PROOF OF SERVICE

Securities and Exchange Commission v. Ralph T. Iannelli and Essex Capital Corporation
USDC, Central District of California – Case No. 2:18-cv-05008-FMO-AFM

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

On **April 30, 2019**, I caused to be served the document entitled: **NOTICE OF FIRST INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, GENERAL COUNSEL TO THE RECEIVER, FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES** on all the parties to this action addressed as stated on the attached service list.

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with the firm's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

OVERNIGHT DELIVERY: I deposited in a box or other facility regularly maintained by express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelope(s) or package(s) designed by the express service carrier, addressed as indicated on the attached service list, with fees for overnight delivery paid or provided for.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **April 30, 2019** at Los Angeles, California.

/s/ Martha Diaz
Martha Diaz

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SERVICE LIST

Securities and Exchange Commission v. Ralph T. Iannelli and Essex Capital Corporation
USDC, Central District of California – Case No. 2:18-cv-05008-FMO-AFM

Mark Riera, Esq.
Jeffer Mangels Butler & Mitchell LLP
1900 Avenue of the Stars, 7th Floor
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Via First Class Mail