

1 DAVID R. ZARO (BAR NO. 124334)  
2 JOSHUA A. DEL CASTILLO (BAR NO. 239015)  
3 NORMAN M. ASPIS (BAR NO. 313466)  
4 ALLEN MATKINS LECK GAMBLE  
5 MALLORY & NATSIS LLP  
6 865 South Figueroa Street, Suite 2800  
7 Los Angeles, California 90017-2543  
8 Phone: (213) 622-5555  
9 Fax: (213) 620-8816  
10 E-Mail: dzaro@allenmatkins.com  
11 jdelcastillo@allenmatkins.com  
12 naspis@allenmatkins.com

13 Attorneys for Receiver  
14 GEOFF WINKLER

15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA  
17 WESTERN DIVISION

18 SECURITIES AND EXCHANGE  
19 COMMISSION,

20 Plaintiff,

21 v.

22 RALPH T. IANNELLI and ESSEX  
23 CAPITAL CORP.,

24 Defendants.

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

NOTICE OF SECOND 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

[April 1, 2019 - June 30, 2019]

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

Date: September 19, 2019

Time: 10:00 a.m.

Ctrm: 6D

Judge Hon. Fernando M. Olguin

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1           **PLEASE TAKE NOTICE THAT** on September 19, 2019, or as soon  
2 thereafter as this matter may be heard in Courtroom 6D of the above-captioned  
3 Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Geoff  
4 Winkler (the "Receiver"), the Court-appointed permanent receiver for Defendant  
5 Essex Capital Corporation and its subsidiaries and affiliates (collectively, the  
6 "Receivership Entities"), along with his counsel of record, Allen Matkins Leck  
7 Gamble Mallory & Natsis LLP ("Allen Matkins" or "Professionals"), will and  
8 hereby do submit their collective Second Interim Application for Payment of Fees  
9 and Reimbursement of Expenses (the "Application").

10           The Application has been submitted concurrently herewith. Pursuant to the  
11 Application, the Receiver and Allen Matkins seek approval and partial payment of  
12 their respective fees and expenses<sup>1</sup> for the period from April 1, 2019 through June  
13 30, 2019, as follows:

<u>Applicant</u>	<u>Fees</u>	<u>Expenses</u>	<u>Total Amount</u>
<b>Receiver</b>	\$177,830.75	\$2,094.12	\$179,924.87
<b>Allen Matkins</b>	\$130,994.55	\$1,713.92	\$132,708.47
<b><u>Total</u></b>	<b>\$308,825.30</b>	<b>\$3,808.04</b>	<b>\$312,633.34</b>

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

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25 <sup>1</sup> The Receiver and Allen Matkins request payment of their fees, on an interim  
26 basis, at a reduced percentage of 80%, with the remaining "holdback" subject to  
27 payment at the time of the Receiver's and Allen Matkins' submission of their  
28 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 \$142,264.60 and \$2,094.12, respectively, and Allen  
Matkins' fees and expenses in the amounts of \$104,795.64 and \$1,713.92,  
respectively.

1 Any interested parties who wish to review the Application may do so by  
2 accessing the Receiver's website at www.essex-receivership.com or by accessing the  
3 Application via the United States District Court's PACER (Public Access to Court  
4 Electronic Records) system (account required) at www.pacer.gov.

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

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Dated: August 14, 2019

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

By:           /s/ Joshua A. del Castillo            
JOSHUA A. DEL CASTILLO  
Attorneys for Receiver  
GEOFF WINKLER

**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 **August 14, 2019**, I caused to be served the document entitled: **NOTICE OF SECOND 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 [April 1, 2019 thru June 30, 2019]** 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 **August 14, 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, 7<sup>th</sup> Floor  
Los Angeles, CA 90067-4308

Via First Class Mail