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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 expenses¹ 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>
Receiver	\$177,830.75	\$2,094.12	\$179,924.87
Allen Matkins	\$130,994.55	\$1,713.92	\$132,708.47
<u>Total</u>	\$308,825.30	\$3,808.04	\$312,633.34

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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 ¹ 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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11 Dated: August 14, 2019

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

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By: /s/ Joshua A. del Castillo

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JOSHUA A. DEL CASTILLO
Attorneys for Receiver
GEOFF WINKLER

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