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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 HEARING ON
 ELEVENTH INTERIM
 APPLICATION OF RECEIVER,
 GEOFF WINKLER, AND HIS
 GENERAL COUNSEL, ALLEN
 MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP, FOR
 PAYMENT OF FEES AND
 REIMBURSEMENT OF EXPENSES**

Date: April 28, 2022
 Time: 10:00 a.m.
 Ctrm: 6D
 Judge: Hon. Fernando M. Olguin

25 **PLEASE TAKE NOTICE** that on April 28, 2022, at 10:00 a.m. or as soon
 26 thereafter as this matter may be heard in Courtroom 6D of the above-captioned
 27 Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, California 90012, Geoff
 28 Winkler (the "Receiver"), the Court-appointed permanent receiver for defendant
 Essex Capital Corporation and its subsidiaries and affiliates, and his counsel of
 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins," and
 together, with the Receiver, the "Applicants"), will jointly submit their eleventh

1 interim application for the payment of fees and the reimbursement of expenses (the
 2 "Fee Application").

3 The Fee Application has been submitted concurrently herewith. Pursuant to
 4 the Fee Application, the Applicants seek approval, payment, and reimbursement of
 5 their respective fees and expenses incurred during the period from October 1, 2021,
 6 through December 31, 2021, as follows¹:

7 Applicant	Fees	Expenses	Total
8 Receiver	\$93,801.00	\$2,150.43	\$95,951.43
9 Allen Matkins	\$402,426.45	\$26,588.10	\$429,014.55
10 [REDACTED]	\$496,227.45	\$28,738.53	\$524,965.98

11 **PLEASE TAKE FURTHER NOTICE** that the Fee Application is based on
 12 this notice, the concurrently filed memorandum of points and authorities and
 13 declaration of Geoff Winkler, and any argument or evidence presented to the Court
 14 at the hearing on the Fee Application.

15 **PLEASE TAKE FURTHER NOTICE** that you may obtain a copy of the
 16 Fee Application by accessing the Receiver's website at [https://essex-](https://essex-receivership.com/)
 17 [receivership.com/](https://essex-receivership.com/) or via the United States Courts' PACER (Public Access to Court
 18 Electronic Records) system (account required) at <https://pacer.uscourts.gov/>.

19 **PLEASE TAKE FURTHER NOTICE that if you oppose the Fee**
 20 **Application, you are required to file your written opposition with the Office of**
 21 **the Clerk, United States District Court for the Central District of California,**
 22 **255 East Temple Street, Los Angeles, California 90012 and serve the same on**
 23

24
 25

26 ¹ The Applicants request payment of their fees, on an interim basis, at a reduced
 27 80%, with the remaining 20% "holdback" subject to payment at the time of the
 28 Applicants' submission of their final fee application in this matter. Accordingly,
 by the Fee Application, the Applicants request that the Court authorize an interim
 payment of (a) the Receiver's fees and expenses in the amounts of \$75,040.80
 and \$2,150.43, respectively, and (b) Allen Matkins' fees and expenses in the
 amounts of \$321,941.16 and \$26,588.10, respectively.

1 **the undersigned not later than 21 days prior to the above-referenced hearing**
2 **date.**

3
4 Dated: March 25, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO
JOSHUA A. DEL CASTILLO
MATTHEW D. PHAM

7 By: /s/ Matthew D. Pham

8 MATTHEW D. PHAM
9 Attorneys for Receiver
10 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 **March 25, 2022**, I caused to be served on all the parties to this action addressed as stated on the attached service list the document entitled: **NOTICE OF HEARING ON ELEVENTH INTERIM APPLICATION OF RECEIVER, GEOFF WINKLER, AND HIS GENERAL COUNSEL, ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES**

- 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.

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 **March 25, 2022** at Los Angeles, California.

/s/ Martha Diaz
Martha Diaz