

1 DAVID R. ZARO (BAR NO. 124334)
 2 JOSHUA A. DEL CASTILLO (BAR NO. 239015)
 3 MATTHEW D. PHAM (BAR NO. 287704)
 ALLEN MATKINS LECK GAMBLE
 4 MALLORY & NATSIS LLP
 865 South Figueroa Street, Suite 2800
 5 Los Angeles, California 90017-2543
 Phone: (213) 622-5555
 Fax: (213) 620-8816
 E-Mail: dzaro@allenmatkins.com
 6 jdelcastillo@allenmatkins.com
 mpham@allenmatkins.com

7 Attorneys for Receiver
 8 GEOFF WINKLER

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

12 SECURITIES AND EXCHANGE
 13 COMMISSION,

14 Plaintiff,

15 vs.

16 RALPH T. IANNELLI and ESSEX
 CAPITAL CORP.,

17 Defendants.

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

**NOTICE OF HEARING ON
 THIRTEENTH INTERIM
 APPLICATION OF RECEIVER,
 GEOFF WINKLER, AND HIS
 PROFESSIONALS FOR PAYMENT
 OF FEES AND REIMBURSEMENT
 OF EXPENSES**

Date: October 13, 2022
 Time: 10:00 a.m.
 Ctrm: 6D
 Judge: Hon. Fernando M. Olguin

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1 **TO THE HONORABLE FERNANDO M. OLGUIN, UNITED STATES**
2 **DISTRICT JUDGE, AND ALL INTERESTED PARTIES:**

3 **PLEASE TAKE NOTICE** that on October 13, 2022, at 10:00 a.m. or as
4 soon thereafter as this matter may be heard in Courtroom 6D of the above-captioned
5 Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, California 90012, Geoff
6 Winkler (the "Receiver"), the Court-appointed permanent receiver for defendant
7 Essex Capital Corporation and its subsidiaries and affiliates, along with his counsel
8 of record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
9 and his tax accountant, Miller Kaplan Arase, LLP ("Miller Kaplan," and
10 collectively, with the Receiver and Allen Matkins, the "Applicants"), will jointly
11 submit their thirteenth interim application for the payment of fees and the
12 reimbursement of expenses (the "Fee Application").

13 The Fee Application has been submitted concurrently herewith. Pursuant to
14 the Fee Application, the Applicants seek approval, payment, and reimbursement of
15 their respective fees and expenses incurred during the period from April 1, 2022,
16 through June 30, 2022 (with respect to the Receiver and Allen Matkins) and during
17 the period from October 1, 2021, through May 31, 2022 (with respect to Miller
18 Kaplan), as follows¹:

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24 ¹ The Applicants request payment of their fees, on an interim basis, at a reduced
25 80%, with the remaining 20% "holdback" subject to payment at the time of the
26 Applicants' submission of their final fee application in this matter. Accordingly,
27 by the Fee Application, the Applicants request that the Court authorize an interim
28 payment of (a) the Receiver's fees and expenses in the amounts of \$92,034.80
and \$1,414.83, respectively, (b) Allen Matkins's fees and expenses in the
amounts of \$238,191.84 and \$7,746.75, respectively, and (c) Miller Kaplan's fees
in the amount of \$6,188.80.

Applicant	Fees	Expenses	Total
Receiver	\$115,043.50	\$1,414.83	\$116,458.33
Allen Matkins	\$297,739.80	\$7,746.75	\$305,486.55
Miller Kaplan	\$7,736.00	\$0.00	\$7,736.00
	\$420,519.30	\$9,161.58	\$429,680.88

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

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

PLEASE TAKE FURTHER NOTICE that, if you oppose the Fee Application, you are required to file your written opposition with the Office of the Clerk, United States District Court for the Central District of California, 255 East Temple Street, Los Angeles, California 90012 and serve the same on the undersigned not later than 21 days prior to the above-referenced hearing date.

Dated: September 15, 2022

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

By: /s/ Matthew D. Pham

MATTHEW D. PHAM
Attorneys for Receiver
GEOFF WINKLER