

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
 FOURTEENTH INTERIM
 APPLICATION OF RECEIVER,
 GEOFF WINKLER, AND HIS
 PROFESSIONALS FOR PAYMENT
 OF FEES AND REIMBURSEMENT
 OF EXPENSES**

Date: January 19, 2023
 Time: 10:00 a.m.
 Ctrm: 6D
 Judge: Hon. Fernando M. Olguin

20 ///
 21 ///
 22 ///
 23 ///
 24 ///
 25 ///
 26 ///
 27 ///
 28 ///

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

3 **PLEASE TAKE NOTICE** that on January 19, 2023, at 10:00 a.m. or as soon
 4 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, and his counsel of
 8 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins," and
 9 together, with the Receiver, the "Applicants"), will jointly submit their fourteenth
 10 interim application for the payment of fees and the reimbursement of expenses (the
 11 "Fee Application").

12 The Fee Application has been submitted concurrently herewith. Pursuant to
 13 the Fee Application, the Applicants seek approval, payment, and reimbursement of
 14 their respective fees and expenses incurred during the period from July 1, 2022,
 15 through September 30, 2022, as follows¹:

Applicant	Fees	Expenses	Total
Receiver	\$68,966.60	\$6,609.30	\$75,575.90
Allen Matkins	\$223,695.45	\$7,671.84	\$231,367.29
	\$292,662.05	\$14,281.14	\$306,943.19

16
 17
 18
 19
 20 **PLEASE TAKE FURTHER NOTICE** that the Fee Application is based on
 21 this notice, the concurrently filed memorandum of points and authorities and
 22
 23

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 \$55,173.28
 and \$6,609.30, respectively, and (b) Allen Matkins's fees and expenses in the
 amounts of \$178,956.36 and \$7,671.84, respectively.

1 declaration of Geoff Winkler, and any argument or evidence presented to the Court
2 at the hearing on the Fee Application.

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

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

12
13
14 Dated: December 21, 2022

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

15
16
17 By: /s/ Matthew D. Pham

MATTHEW D. PHAM
Attorneys for Receiver
GEOFF WINKLER

18
19
20
21
22
23
24
25
26
27
28