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

Date: October 26, 2023  
 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 26, 2023, 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, 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 seventeenth  
 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 April 1, 2023  
 15 through June 30, 2023, as follows<sup>1</sup>:

| Applicant     | Fees (Inclusive of Discounts, if any) | Expenses          | Total               |
|---------------|---------------------------------------|-------------------|---------------------|
| Receiver      | \$30,327.70                           | \$1,720.25        | <b>\$32,047.95</b>  |
| Allen Matkins | \$96,477.08                           | \$6,663.12        | <b>\$103,140.20</b> |
|               | <b>\$126,804.78</b>                   | <b>\$8,383.37</b> | <b>\$135,188.15</b> |

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 20 **PLEASE TAKE FURTHER NOTICE** that the Fee Application is based on  
 21 this notice, the concurrently filed memorandum of points and authorities and  
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24 <sup>1</sup> 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 \$24,262.16  
 and \$1,720.25, respectively, and (b) Allen Matkins' fees and expenses in the  
 amounts of \$77,181.66 and \$6,663.12, 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.

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14 Dated: September 21, 2023

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

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17 By:           /s/ Matthew D. Pham          

MATTHEW D. PHAM  
Attorneys for Receiver  
GEOFF WINKLER

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