

1  
2  
3  
4  
5  
6  
7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA  
10 WESTERN DIVISION

11 SECURITIES AND EXCHANGE  
12 COMMISSION,

13 Plaintiff,

14 vs.

15 RALPH T. IANNELLI and ESSEX  
CAPITAL CORP.,

16 Defendants.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No. 2:18-cv-05008-FMO-AJR<sub>x</sub>

**[PROPOSED] ORDER GRANTING  
TWENTY-FOURTH INTERIM  
APPLICATION OF RECEIVER,  
GEOFF WINKLER, AND HIS  
PROFESSIONALS FOR PAYMENT  
OF FEES AND REIMBURSEMENT  
OF EXPENSES**

Date: July 31, 2025

Time: 10:00 a.m.

Ctrm: 6D

Judge Hon. Fernando M. Olguin

1 Before the Court is the twenty-fourth interim application for the payment of  
2 fees and the reimbursement of expenses (the "Fee Application") of Geoff Winkler  
3 (the "Receiver"), the Court-appointed permanent receiver for defendant Essex  
4 Capital Corporation and its subsidiaries and affiliates (collectively, the  
5 "Receivership Entities"), and his counsel of record, Allen Matkins Leck Gamble  
6 Mallory & Natsis LLP ("Allen Matkins" and, together with the Receiver, the  
7 "Applicants").

8 The Fee Application covers the Applicants' fees and expenses incurred during  
9 the period from January 1, 2025 through March 31, 2025, (the "Application  
10 Period"). The Receiver requests approval of 100% of his fees and expenses incurred  
11 during the Application Period (\$15,348.10 and \$1,058.90, respectively) and  
12 payment, on an interim basis, of 80% of those fees (\$12,278.48) and 100% of those  
13 expenses (\$1,058.90). Allen Matkins likewise requests approval of 100% of its fees  
14 and expenses incurred during the Application Period (\$34,211.57 and \$6,697.53,  
15 respectively) and payment, on an interim basis, of 80% of those fees (\$27,369.25)  
16 and 100% of those expenses (\$6,697.53).

17 The Court having considered the Fee Application, and good cause appearing  
18 therefor,

19 **IT IS HEREBY ORDERED** that

- 20 1. The Fee Application is granted in its entirety;
- 21 2. The Receiver's fees and expenses incurred during the Application  
22 Period, in the respective amounts of \$15,348.10 and \$1,058.90, are approved;
- 23 3. The Receiver is authorized to pay himself, on an interim basis, 80% of  
24 his approved fees incurred during the Application Period, in the amount of  
25 \$12,278.48, and 100% of his approved expenses incurred during the Application  
26 Period, in the amount of \$1,058.90, from the funds of the receivership estate of the  
27 Receivership Entities (the "Receivership Estate");

1           4.     Allen Matkins' fees and expenses incurred during the Application  
2 Period, in the respective amounts of \$34,211.57 and \$6,697.53, are approved;

3           5.     The Receiver is authorized to pay Allen Matkins, on an interim basis,  
4 80% of its approved fees incurred during the Application Period, in the amount of  
5 \$27,369.25, and 100% of its approved expenses incurred during the Application  
6 Period, in the amount of \$6,697.53, from the funds of the Receivership Estate; and

7           6.     The fees that have been approved but have not been otherwise  
8 authorized to be paid at this time by this Order shall be subject to final review by the  
9 Court in connection with the Applicants' final fee application, to be submitted  
10 contemporaneously with the winddown and termination of the receivership in the  
11 above-entitled matter.

12  
13  
14 Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Fernando M. Olguin  
United States District Judge