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

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

Date: December 4, 2025

Time: 10:00 a.m.

Ctrm: 6D

Judge Hon. Fernando M. Olguin

1 Before the Court is the twenty-fifth 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 April 1, 2025 through June 30, 2025, (the "Application Period").  
10 The Receiver requests approval of 100% of his fees and expenses incurred during  
11 the Application Period (\$29,133.80 and \$284.21, respectively) and payment, on an  
12 interim basis, of 80% of those fees (\$23,307.04) and 100% of those expenses  
13 (\$284.21). Allen Matkins likewise requests approval of 100% of its fees and  
14 expenses incurred during the Application Period (\$76,573.35 and \$6,909.55  
15 respectively) and payment, on an interim basis, of 80% of those fees (\$61,258.68)  
16 and 100% of those expenses (\$6,909.55).

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 \$29,133.80 and \$284.21, 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 \$23,307.04, and 100% of his approved expenses incurred during the Application  
26 Period, in the amount of \$284.21, from the funds of the receivership estate of the  
27 Receivership Entities (the "Receivership Estate");
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1           4.     Allen Matkins' fees and expenses incurred during the Application  
2 Period, in the respective amounts of \$76,573.35 and \$6,909.55, 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 \$61,258.68, and 100% of its approved expenses incurred during the Application  
6 Period, in the amount of \$6,909.55, 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.

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14 Dated: \_\_\_\_\_

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Hon. Fernando M. Olguin  
United States District Judge