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9 GEOFF WINKLER

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

13 SECURITIES AND EXCHANGE
COMMISSION,

14 Plaintiff,

15 vs.

16 RALPH T. IANNELLI and ESSEX
17 CAPITAL CORP.,

18 Defendants.

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

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

Date: February 6, 2025
Time: 10:00 a.m.
Ctrm: 6d
Judge Hon. Fernando M. Olguin

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

23 **PLEASE TAKE NOTICE** that on February 6, 2025, at 10:00 a.m., or as
24 soon thereafter as this matter may be heard in Courtroom 6D of the above-captioned
25 Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, California 90012, Geoff
26 Winkler (the "Receiver"), the Court-appointed permanent receiver for defendant
27 Essex Capital Corporation and its subsidiaries and affiliates, and his counsel of
28 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins," and

1 together, with the Receiver, the "Applicants"), will jointly submit their Twenty-
2 second Interim Application for the Payment of Fees and Reimbursement of
3 Expenses (the "Fee Application").

4 The Fee Application has been submitted concurrently herewith. Pursuant to
5 the Fee Application, the Applicants seek approval, payment, and reimbursement of
6 their respective fees and expenses incurred during the period from July 1, 2024
7 through September 30, 2024, as follows¹:

Applicant	Fees (Inclusive of Discounts, if any)	Expenses	Total
Receiver	\$32,892.10	\$1,357.69	\$34,249.79
Allen Matkins	\$31,988.52	\$2,201.20	\$34,189.72
	\$64,880.62	\$3,558.89	\$68,439.51

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12 **PLEASE TAKE FURTHER NOTICE** that the Fee Application is based on
13 this Notice, the concurrently filed Application, Memorandum of Points and
14 Authorities, and Declaration of Geoff Winkler, along with any argument or evidence
15 presented to the Court at the hearing on the Fee Application.

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

20 **PLEASE TAKE FURTHER NOTICE** that, if you oppose the Fee
21 Application, you are required to file your written opposition with the Office of the
22 Clerk, United States District Court for the Central District of California, 255 East
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 \$26,313.68
and \$1,357.69, respectively, and (b) Allen Matkins' fees and expenses in the
amounts of \$25,590.82 and \$2,201.20, respectively.

1 Temple Street, Los Angeles, California 90012 and serve the same on the
2 undersigned not later than 21 days prior to the above-referenced hearing date.

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Dated: December 27, 2024

ALLEN MATKINS LECK GAMBLE
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DAVID R. ZARO
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By: /s/ Alphamorlai L. Kebeh

ALPHAMORLAI L. KEBEH
Attorneys for Receiver
GEOFF WINKLER