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10 Attorneys for Receiver
11 KRISTA L. FREITAG

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 FEDERAL TRADE COMMISSION,
15 Plaintiff,

16 vs.

17 IMPETUS ENTERPRISE, INC., a
California corporation, also d/b/a Aiding
Student Relief, Aiding Students &
18 Teachers, Aidnest, Avec Staffing, and
National Education Student and Teacher;
FIG TREE & CO., LLC, a California
19 limited liability company, also d/b/a
Aiding Student Relief, Aiding Students
20 & Teacher, and Aiding Students &
Teachers; TUAN DINH DUONG, a/k/a
21 Thomas Duong, a/k/a Thomas Dinh,
individually and as an officer of
22 IMPETUS ENTERPRISE, INC.;
BRENDA AVITIA-PENA, individually
23 and as an officer of IMPETUS
ENTERPRISE, INC. and FIG TREE &
24 CO., LLC; and BRIAN COLOMBANA
d/b/a FUTERO, individually and as an
25 officer of FIG TREE & CO., LLC,

26 Defendants,

27 NOEL SOLUTIONS, LLC, a Wyoming
limited liability company,

28 Relief Defendant.

Case No. 8:18-cv-01987-JLS-KES

**NOTICE OF HEARING ON
INTERIM FEE APPLICATIONS OF
KRISTA L. FREITAG, RECEIVER
AND HER PROFESSIONALS FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: September 27, 2019
Time: 10:30 a.m.
Ctrm.: 10A
Judge: Hon. Josephine L. Staton

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on September 27, 2019, at 10:30 a.m. in
 3 Courtroom 10A of the above-entitled Court, located at 411 West Fourth Street,
 4 Santa Ana, California 92701-4516, the Court will consider the interim applications
 5 of Krista L. Freitag ("Receiver"), the Court-appointed permanent receiver for
 6 Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of
 7 their subsidiaries, affiliates, successors and assigns, and any other entity that has
 8 conducted any business related to Defendants' student debt relief enterprise,
 9 including but not limited to Capital Sun Investments, LLC (d/b/a Studora) or
 10 Premier Capital Investments, LLC, and Jimmy Calderon (when conducting activities
 11 in relation to any of the foregoing entities) (the "Receivership Entities"), and her
 12 general counsel, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen
 13 Matkins"), for approval and payment of fees and expenses ("Applications").

14 The following table summarizes the fees incurred, interim payment requested,
 15 and costs requested for the period from April 1, 2019, through June 30, 2019:

Applicant	Fees Incurred	Interim Payment Requested	Costs	Total Payment Requested
Krista L. Freitag, Receiver	\$8,980.20	\$7,184.16 (80%)	\$260.00 (100%)	\$7,444.16
Allen Matkins Leck Gamble Mallory & Natsis LLP, General Counsel	\$12,224.25	\$9,779.40 (80%)	\$812.65 (100%)	\$10,592.05

23 **Procedural Requirements:** If you oppose these Applications, you are
 24 required to file your written opposition with the Office of the Clerk, United States
 25 District Court, 411 West Fourth Street, Santa Ana, California 92701-4516 and serve
 26 the same on the undersigned not later than 21 calendar days prior to the hearing.

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1 IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION by the
2 above date, the Court may grant the requested relief without further notice.

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4 Dated: July 31, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA L. FREITAG

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