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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: March 29, 2019  
Time: 2:30 p.m.  
Ctm.: 10A  
Judge: Hon. Josephine L. Staton

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on March 29, 2019, at 2:30 p.m. in Courtroom 10A  
 3 of the above-entitled Court, located at 411 West Fourth Street, Santa Ana,  
 4 California 92701-4516, the Court will consider the interim applications of Krista L.  
 5 Freitag ("Receiver"), the Court-appointed permanent receiver for Impetus  
 6 Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of their  
 7 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 November 13, 2018, through December 31,  
 16 2018:

17 <b>Applicant</b>	18 <b>Fees Incurred</b>	19 <b>Interim Payment Requested</b>	20 <b>Costs</b>	21 <b>Total Payment Requested</b>
22 Krista L. Freitag, 23 Receiver	\$58,590.00	\$46,872.00 (80%)	\$5,232.36 (100%)	\$52,104.36
24 Allen Matkins 25 Leck Gamble 26 Mallory & 27 Natsis LLP, 28 General Counsel	\$25,641.90	\$20,513.52 (80%)	\$904.00 (100%)	\$21,417.52

24 **Procedural Requirements:** If you oppose these Applications, you are  
 25 required to file your written opposition with the Office of the Clerk, United States  
 26 District Court, 411 West Fourth Street, Santa Ana, California 92701-4516 and serve  
 27 the same on the undersigned not later than 21 calendar days prior to the hearing.  
 28

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.

3  
4 Dated: January 29, 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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