

1 **RAINES FELDMAN LITTRELL LLP**  
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5 Attorneys for Receiver  
6 STAPLETON GROUP, INC.

7  
8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10  
11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

14 AUTOMATORS LLC, et al.,

15 Defendants.

16  
17 PEREGRINE WORLDWIDE, LLC, a  
Delaware limited liability company,

18 Relief Defendant.

Case No.: 3:23-cv-01444-DMS-BGS

Assigned to Hon. Dana M. Sabraw

**NOTICE OF MOTION AND  
MOTION OF RECEIVER FOR:**

**(A) APPROVAL AND PAYMENT  
OF FEES AND EXPENSES FOR  
NOVEMBER 1, 2023 THROUGH  
APRIL 30, 2024 OF:**

**(1) RECEIVER STAPLETON  
GROUP, INC.**

**(2) RAINES FELDMAN  
LITTRELL LLP; AND**

**(B) FOR APPROVAL OF FORM  
AND/OR LIMITATION OF  
NOTICE**

Date: June 21, 2024

Time: 1:30 p.m.

Dept: Ctrm 13A

Place: United States District Court  
333 West Broadway  
San Diego, CA 92101

1 PLEASE TAKE NOTICE THAT on June 21, 2024 at 1:30 p.m. in  
2 Courtroom 13A of the above-entitled Court, located at 333 West Broadway, San  
3 Diego, CA 92101, Stapleton Group, Inc., the Court-appointed preliminary  
4 receiver (the “Receiver”), will and hereby does make this Motion of Receiver for  
5 Order: (A) Approving and authorizing payment of fees and costs incurred by the  
6 Receiver and Raines Feldman Littrell LLP for the period from November 1, 2023  
7 through April 30, 2024; and (B) Approving Form and/or Limitation of Notice  
8 Under Local Civil Rule 66-7 (the “Motion”), as follows:

9 1. For the Receiver, for approval of its fees in the amount of  
10 \$171,133.50 and expenses of \$401.37.

11 2. For Raines Feldman Littrell LLP, the Receiver’s general counsel,  
12 for approval of its fees in the amount of \$74,777.90 and \$464.50 in costs.

13 3. The Receiver also moves the Court for an order approving the form  
14 of notice on the Motion provided to interested parties, creditors, and investors,  
15 who are potential creditors of the estate, by the Receiver (a) serving the Motion  
16 and related moving papers on all parties to the action; (b) serving by mail a notice  
17 of hearing on the Motion to all known creditors; (c) serving an electronic notice  
18 of hearing on all known consumers at their last known email address; and (d)  
19 posting a copy of the Motion on the Receiver’s website for the case at  
20 <https://www.automators-empire-onyx-receivership.com/case-documents.aspx>,  
21 as sufficient notice and opportunity for hearing on the Motion under the  
22 circumstances.

23 The Motion is made following the Receiver’s communications with  
24 counsel for the Federal Trade Commission, and the Receiver is informed that the  
25 FTC generally does not oppose the relief sought.

26 This Motion is filed pursuant to Local Civil Rule 66.1(f) and is based upon  
27 this Notice of Motion and Motion, the Memorandum of Points and Authorities,  
28

1 and the Declarations of Jake Diorio and Kathy Bazoian Phelps, filed  
2 concurrently, the separately-filed Notice of Hearing, the pleadings, records, and  
3 file of the Court in this action of which the Receiver requests the Court take  
4 judicial notice pursuant to Rule 201 of the Federal Rules of Civil Procedure, and  
5 upon such further oral argument, testimony and evidence as may be received at  
6 the hearing on this matter.

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8 Dated: June 5, 2024

RAINES FELDMAN LITRELL LLP

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By: s/ Kathy Bazoian Phelps  
Kathy Bazoian Phelps  
Attorneys for Receiver  
STAPLETON GROUP, INC.

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