

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.
19

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

Assigned to Hon. Dana M. Sabraw

**NOTICE OF HEARING ON
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**

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22 Date: June 21, 2024
Time: 1:30 p.m.
23 Dept: Ctrm 13A
Place: United States District Court
24 333 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 pursuant to Local Civil Rule 66-
18 7; (c) serving an electronic notice of hearing on all known consumers at their last
19 known email address; and (d) posting a copy of the Motion on the Receiver’s
20 website for the case at [https://www.automators-empire-onyx-
21 receivership.com/case-documents.aspx](https://www.automators-empire-onyx-receivership.com/case-documents.aspx) as sufficient notice and opportunity for
22 hearing on the Motion under the circumstances.

23 The Motion is made following the Receiver’s communications with
24 counsel for the Federal Trade Commission under Local Rule 7-3, and the
25 Receiver is informed that the 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 and the Declarations of Jake Diiorio and Kathy Bazoian Phelps, filed

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

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Dated: June 5, 2024

RAINES FELDMAN LITRELL LLP

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