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10 Attorneys for Plaintiff
11 FEDERAL TRADE COMMISSION

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 _____)
15 FEDERAL TRADE COMMISSION,)

16)
17 Plaintiff,)

18 vs.)

Case No. SACV13-019-DOC (RNBx)

19 A TO Z MARKETING, INC., a)
20 Nevada corporation, also dba Client)
Services et al.,)

21 Defendants.)
22 _____)

23
24 PRELIMINARY INJUNCTION AS TO DEFENDANTS
25 A TO Z MARKETING, INC., APEX MEMBERS, LLC,
26 APEX SOLUTIONS, INC., EXPERT PROCESSING CENTER, INC.,
27 SMART FUNDING CORP., WILLIAM D. GOODRICH, ATTY, INC.,
28 RATAN BAID, MADHULIKA BAID, AND WILLIAM D. GOODRICH

1 On June 18, 2013, the Federal Trade Commission (FTC or Commission),
2 filed PLAINTIFF FEDERAL TRADE COMMISSION'S COMPLAINT FOR
3 INJUNCTIVE AND OTHER EQUITABLE RELIEF (Doc. 1) (Complaint)
4 seeking temporary, preliminary, and permanent injunctive relief, rescission or
5 reformation of contracts, restitution, the refund of monies paid, disgorgement of
6 ill-gotten monies, and other equitable relief. The Complaint alleged that the
7 Defendants had violated and were violating the Federal Trade

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1 filed an Opposition to the preliminary injunction on July 3, 2013, causing the Court
2 to set a hearing for July 18, 2013 (Doc. 67), which was later advanced to July 17,
3 2013 (Doc 68). This matter is now before the Court on the FTC's request for a
4 preliminary injunction.

5
6 FINDINGS OF FACT

7 1. This Court has jurisdiction over the subject matter of this case and of
8 the parties. Venue in this district is proper.

9 2. The Commission and the Baid Defendants have been represented by
10 counsel in the negotiations concerning the joint motion and proposed preliminary
11 injunction.

12 3. The Commission and the Baid Defendants agree to the terms of this
13 preliminary injunction and to its entry by the Court.

14 4. The Baid Defendants' agreement to
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1 goods, equipment, fixtures, patents, licenses, leaseholds, contracts, mail or other
2 deliveries, checks, notes, deposits, accounts, credits, accounts receivable, securities
3 of any type, and trusts, including but not limited to any trust held for the benefit of
4 any Defendant, any individual Defendant's minor children, or of any Individual
5 Defendant

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1 Funding Corp., William D. Goodrich, Atty Inc., and their successors, assigns,
2 affiliates, or subsidiaries, and each of them by whatever names each might be
3 known.

4 D. Defendants means all Individual Defendants and all Corporate
5 Defendants, individually, collectively, or in any combination, and each of them, by
6 whatever names each might be known.

7 E. Document bqsans c scope to and all Co8y, or in

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offline storage used by Defendants or Defendants

1 dwelling loan, (ii) reinstate his or her dwelling loan, (iii) redeem a dwelling,
2 or (iv) exercise any right to reinstate a dwelling loan or redeem a dwelling;

3 5. obtaining any waiver of an acceleration clause or balloon
4 payment contained in any promissory note or contract secured by any
5 dwelling; or

6 6. negotiating, obtaining, or arranging (i) a short sale of a
7 dwelling, (ii) a deed in lieu of foreclosure, (iii) or any other disposition of a
8 dwelling other than a sale to a third party that is not the dwelling loan
9 holder.

10 The foregoing shall include any manner of claimed assistance, including, but not
11 limited to, auditing or examining a consumer's mortgage or home loan
12 application, offering to provide or providing legal services, or offering to sell a
13 consumer a plan or subscription to a service that provides such assistance.
14 business.

15 J. Person means any individual and a partnership, corporation,
16 limited liability company, association, or other entity, however formed or
17 organized.

18 K. Receivership Defendants means A to Z Marketing, Inc., Apex
19 Members, LLC, Apex Solutions, Inc., Expert Processing Center, Inc., Smart
20 Funding Corp., William D. Goodrich, Attorney, Inc., Top Legal Advocates, P.C., and
21 Evergreen Law Offices, PLLC, as well as any affiliates and subsidiaries that
22 conduct any business related to the Receivership Defendant's provision of MARS
23 and that the Receiver has reason to believe are owned or controlled in whole or in
24 part by any of the Defendants, *provided, however*, that Summit Client Solutions,
25 Inc., is a Receivership Defendant until the time that the Receiver determines
26 otherwise *provided further, however*, that Red Hill Plaza, LLC, and Getting
27 Visible, a dba Amenisha Group, Inc. are not Receivership Defendants, *provided*
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1 *further, however*, that Ratan Baid may use the ~~ma~~ Expert Marketing Services
2 for businesses unrelated to mortgage assistance relief products or services.

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4 I. PROHIBITED REPRESENTATIONS

5 IT IS ORDERED THAT Defendants and their successors, assigns,
6 officers, agents, servants, employees, ~~attys~~, and all other persons in active
7 concert or participation with any of them, who receive actual notice of this Order,
8 by personal service, facsimile, email, ~~or~~ otherwise, whether acting directly or
9 through any trust, corporation, ~~ati~~, subsidiary, division, or other device, are temporarily
10 restrained and enjoined from falsely ~~repr~~esenting, or assisting others who are
11 falsely representing, expressly or by implication, any of the following:

12 A. That any Defendant or any other ~~the~~ person generally will obtain for
13 consumers mortgage loan modifications that will make consumers ~~pa~~payments
14 substantially more affordable, or will help consumers avoid foreclosure;

15 B. That any Defendant or any other ~~son~~ person, as a result of various loan
16 audits, including a forensic loan ~~aud~~ generally will obtain for consumers
17 mortgage loan modifications that will make consumers ~~pa~~payments substantially
18 more affordable, or will help ~~co~~ consumers avoid foreclosure; and,

19 C. The amount of time it will take the ~~rtg~~ mortgage assistance relief service
20 provider to accomplish any ~~repr~~esented service or result.

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22 II. PROHIBITION ON COLLECTING ADVANCE FEES

23 IT IS FURTHER ORDERED THAT Defendants and their successors,
24 assigns, officers, agents, servants, employees, ~~attys~~ attorneys, and all other persons in
25 active concert or participation with any of them, who receive actual notice of this
26 Order, by personal service, ~~sa~~ facsimile, email, or otherwise, whether acting directly
27 or through any trust, corporation, ~~subs~~ subsidiary, division, or other device, in
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1 connection with the telemarketing, advertising, marketing, promotion, offering for
2 sale or sale of any mortgage assistance relief product or service or any other credit-
3 or debt-related good or service, are temporarily restrained and enjoined from
4 asking for or receiving payment before the consumer has executed a written
5 agreement between the consumer and the lender, loan holder, or servicer of
6 secured or unsecured debt that incorporates the offer obtained by Defendants on
7 the consumer's behalf.

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9 III. FAILURE TO DISCLOSE INFORMATION REQUIRED
10 BY THE MARS RULE

11 IT IS FURTHER ORDERED THAT Defendants and their successors,
12 assigns, officers, agents, servants, employees, attorneys, and all other persons in
13 active concert or participation with any of them, who receive actual notice of this
14 Order, by personal service, mail, email, or otherwise, whether acting directly
15 or through any trust, corporation, subsidiary, division, or other device, are
16 temporarily restrained and enjoined from:

17 A. Failing to make the following disclosure in all general and
18 consumer-specific commercial communications [Name of Company] is not
19 associated with the government, and service is not approved by the government
20 or your lender, in violation of 16 C.F.R. 322.4(a)(1) and 322.4(b)(2),
21 recodified at 12 C.F.R. 1015.4(a)(1) and 1015.4(b)(2);

22 B. Failing to make the following disclosure in all general and
23 consumer-specific commercial communications [Name of Company] is not
24 associated with the government, and service is not approved by the government
25 or your lender, in violation of 16 C.F.R. 322.4(a)(1) and 322.4(b)(2),
26 recodified at 12 C.F.R. 1015.4(a)(1) and 1015.4(b)(2);

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C. Failing to make the following disclosure in all consumer-specific commercial communications:

You may stop doing business with us at any time. You may accept or reject the offer of mortgage assistance we obtain from your lender [or servicer]. If you reject the offer,

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IT IS FURTHER ORDERED THAT Defendants and their successors,

1 employees; and (4) a detailed description of the business's activities and the
2 Defendant's duties;

3 D. Failing to notify the Commission at least seven (7) days before
4 affiliating with, becoming employed by, or performing any work (whether
5 compensated or uncompensated) for any business that is not a named defendant in
6 this action. Each notice shall include the Defendant's new business address and
7 telephone number, a statement of the nature of the business, and a statement of the
8 Defendant's her duties and responsibilities in connection with the business or
9 employment.

10
11 V. PROHIBITION ON RELEASE OF CONSUMER INFORMATION

12 IT IS FURTHER ORDERED THAT, except as required by a law
13 enforcement agency, law, regulation or court order, Defendants and their
14 successors, assigns, officers, agents, servants, employees, attorneys, and all other
15 persons in active concert or participation with any of them, who receive actual
16 notice of this Order, by personal service, facsimile, email, or otherwise, whether
17 acting directly or through any trust, corporation, subsidiary, division, or other
18 device, are temporarily restrained and enjoined from disclosing, using, or
19 benefitting from consumer information, including the name, address, telephone
20 number, email address, social security number, other identifying information, or
21 any data that enables access to a consumer account (including a credit card, bank,
22 or other financial account) of any person which any Defendant obtained prior to
23 entry of this Order in connection with any mortgage assistance relief product or
24 service.

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VI. DISABLEMENT OF WEBSITES AND PRESERVATION OF ELECTRONIC ALLY STORED INFORMATION

IT IS FURTHER ORDERED THAT , immediately upon service of this Order upon them (1) any persons hosting any Internet website server for, or on behalf of, any Defendant, and (2) Defendants and their successors, assigns, officers, agents, servants, employees, attorneys, and those persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, shall, unless already done so in compliance with the TRO or at the instruction of the Receiver appointed in the TRO:

A. Immediately take any necessary steps to render inaccessible to the public any Internet website used by Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of any mortgage assistance relief product or service, and containing statements or representations prohibited by Section I of this Order, including but not limited to the websites www.BurkeLawCenter.com, www.TopLegalAdvocates.com, and www.evergreenlawoffices.com.; and

B. Prevent the alteration, destruction or erasure of (1) any Internet websites used by Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of any mortgage assistance relief product or service, by preserving such websites in the format in which they are maintained currently, and (2) any electronically stored information stored on behalf of Defendants or entities in active concert or participation with any of them.

VII. SUSPENSION OF INTERNET DOMAIN NAME REGISTRATIONS

1 IT IS FURTHER ORDERED THAT , any domain name registrar or other
2 person shall suspend the registration of any Internet website used by Defendants
3 for the advertising, marketing, promotion, offering for sale, sale, or provision of
4 any mortgage assistance related product or service, or containing statements or
5 representations prohibited by Section 1015 of this Order, and provide immediate notice
6 to the FTC and to the Receiver of any other Internet domain names registered by
7 Defendants or their officers, agents, servants, employees, attorneys, and persons or
8 entities in active concert or participation with any of them.

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VIII. ASSET FREEZE

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11 IT IS FURTHER ORDERED THAT Defendants and Receivership
12 Defendants and their officers, agents, servants, employees, attorneys, and all other
13 persons or entities in active concert or participation with any of them who receive
14 actual notice of this Order by personal service, facsimile, email, or otherwise, are
15 temporarily restrained and enjoined from directly or indirectly:

16 A. Selling, assigning, transferring, converting, loaning, conveying,
17 encumbering, concealing, spending, withdrawing, granting a lien or security
18 interest or other interest in, or otherwise disposing of any assets that are:

- 19 1. in the possession, actual or constructive, of any Defendant or
20 Receivership Defendant;
- 21 2. owned or controlled by, held in whole or in part for the benefit
22 of, or subject to access by, any Defendant or Receivership Defendant; or
- 23 3. in the actual or constructive possession of, owned or controlled
24 by, subject to access by, or belonging to any person who is directly or
25 indirectly owned, managed, or under the control of any Defendant or
26 Receivership Defendant;

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1 B. Opening, or causing to be opened, any safe deposit boxes titled in the
2 name of or subject to access by Defendant or Receivership Defendant;

3 C. Cashing any checks from consumers, or customers of any
4 Individual Defendant or Receivership Defendant;

5 D. Failing to disclose to the FTC and to the Receiver, immediately upon
6 service of this Order, information that fully identifies each known asset of any
7 Defendant or Receivership Defendant and the person holding such asset, including,
8 without limitation, the person's name, address, and phone number, the number
9 of an account, and the name under which account or other asset is held;

10 IT IS FURTHER ORDERED THAT the assets affected by this Section
11 VIII shall not include assets acquired after the date of entry of this Order, and shall
12 not include three thousand seven hundred fifty (\$3750) currently due and owing to
13 Defendant Goodrich for legal services related to any mortgage assistance relief
14 product or service;

15 *Provided, however,* that this Section VIII does not prohibit the repatriation
16 of foreign assets as required by Section XII of this Order.

17 *Provide, also,* that freeze on Getting Visible, dba of Amenisha Group, Inc.
18 shall be lifted.

19
20 IX. HANDLING OF DOCUMENTS, RECORDS, AND ASSETS
21 BY THIRD PARTIES

22 IT IS FURTHER ORDERED THAT , any person, including but not
23 limited to any financial institution, electronic data host, or payment processor, who
24 receives actual notice of this Order, by personal service, facsimile, email, or
25 otherwise, who has, or at any time since January 1, 2010, has had, possession,
26 custody, or control of any documents, record
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1 any Individual Defendant or Receivership Defendant shall, unless already done so
2 in compliance with the TRO or at the instruction of the Receiver appointed in the
3 TRO:

4 A. Hold, preserve, and retain within such person's control, and prohibit
5 the withdrawal, removal, alteration, transfer, encumbrance, disbursement,
6 dissipation, sale, liquidation, or other disposal of such documents, records, or
7 assets except as directed in writing by the Receiver as to any property of any
8 Receivership Defendant;

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1 4. if any asset, including any account at any financial institution,
2 has been closed or removed, the date closed or removed, the balance
3 on that date, and the name of the person to whom the account or asset
4 was remitted or transferred;

5 E. Provide counsel for the FTC and the Receiver, within fourteen (14)
6 days after being served with a request, with copies of documents or records and
7 copies of documents pertaining to assets including but not limited to: account
8 statements, account applications, signatures, checks, deposit tickets, transfers
9 to and from the accounts, wire transfers, other debit and credit instruments or
10 slips, 1099 forms, and safe deposit box logs;

11 F. Cooperate with all reasonable requests of the FTC and the Receiver
12 relating to this Order's implementation, including but not limited to transferring
13 funds at the Receiver's direction.

14 G. IT IS FURTHER ORDERED THAT this Section IX shall apply to
15 both existing documents, records and assets and to documents, records, and assets
16 acquired after the date of entry of this Order. This Section IX does not prohibit the
17 Repatriation of Foreign Assets, as required in Section XII of this Order.

18
19 X. FINANCIAL STATEMENTS AND ACCOUNTING

20 IT IS FURTHER ORDERED THAT , unless already done so in
21 compliance with the TRO, each Defendant, within fourteen (14) days of entry of
22 this Order, shall prepare and deliver to counsel for the FTC:

23 A. For Individual Defendants, a complete financial statement accurate
24 as of the date of service of this Order upon such Defendant in the form of
25 Attachment A to this Order captioned "Financial Statement of Individual
26 Defendant;"

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1 territorial United States by signing the Consent to Release of Financial Records to
2 be provided by the FTC within 3 days of entry of this Order and receipt of the form
3 from the FTC, and by signing any other documents required by any person,
4 including any financial institution, or other person holding any such asset.

5
6 XIII. NONINTERFERENCE WITH REPATRIATION

7 IT IS FURTHER ORDERED THAT Defendants are temporarily
8 restrained and enjoined from taking any action, directly or indirectly, that may
9 result in the encumbrance or dissipation of foreign assets or in the hindrance of the
10 repatriation required by Section XII of this Order, including, but not limited to:

11 A. Sending any communication, including but not limited to any
12 statement, letter, fax, email, text message, wire transmission, or telephone call, or
13 engaging in any other act, directly or indirectly, that results in a determination by a
14 foreign trustee or other person that a default event has occurred under the terms of
15 a foreign trust agreement until such time that all assets have been fully repatriated
16 pursuant to Section XII of this Order; or

17 B. Notifying any trustee, protector, or other agent of any foreign trust or
18 other related entities either of the existence of this Order or of the fact that
19 repatriation is required pursuant to a court order, until such time that all assets have
20 been fully repatriated pursuant to Section XII of this Order.

21
22 XIV. CONTINUATION OF RECEIVERSHIP

23 IT IS FURTHER ORDERED THAT the Receivership created by the TRO
24 (Doc 13, p. 19) and extended by this Court ORDER AUTHORIZING
25 TEMPORARY RECEIVER'S IMMEDIATE POSSESSION OF BUSINESS
26 PREMISES OF ADDITIONAL RECEIVERSHIP DEFENDANTS AND
27 CONFIRMING ACTIONS TAKEN BY RECEIVER TO FREEZE ASSETS
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1 (Order Extending Receivership) (Doc. 50) shall continue. The Receiver shall
2 continue to have all the rights, powers, duties, and authority set forth in the TRO
3 and the Order Extending Receivership. Thomas McNamara, the Receiver
4 appointed in the TRO, shall continue as Receiver until further order of this Court.
5 The Receiver shall be the agent of this Court and solely the agent of this Court
6 when acting pursuant to this Order. The Receiver shall be accountable directly to
7 this Court. The Receiver shall comply with all local rules and laws governing
8 receivers.
9

10 XV. DUTIES AND AUTHORITY OF THE RECEIVER

11 IT IS FURTHER ORDERED THAT the Receiver is directed and
12 authorized to accomplish the following:

13 A. Assume and maintain full and exclusive control of the Receivership
14 Defendants by removing, as the Receiver deems necessary and advisable, any
15 officer, director, agent, servant, independent contractor, or any other person in the
16 custody, control, or possession of the Defendants.

1 C. Take all steps necessary to secure and keep secure the business
2 premises of the Receivership Defendants. Such steps may include, but are not
3 limited to, the following, as the Receiver deems necessary or appropriate:

4 1. changing the locks and disconnecting any computer modems,
5 network access, or other means of access to the computer or other records
6 maintained at that location;

7 2. obtaining pertinent information from all employees and other
8 agents of the Receivership Defendants, including, but not limited to, the
9 name, home address, job description, method of compensation, and all
10 accrued and unpaid commissions and compensation of each such employee
11 or agent, and all computer hardware and software passwords, and including
12 the completion of a questionnaire presented by the Receiver;

13 3. requiring any persons present on the premises to provide proof
14 of identification, to leave the premises, and to demonstrate to the satisfaction
15 of the Receiver that such persons are not removing from the premises
16 property (including documents) or assets of the Receivership Defendants;

17 4. completing a written inventory of all Receivership assets;

18 5. videotaping and/or photographing all portions of any location at
19 which any Receivership Defendant conducts business or has assets; and,

20 6. serving and filing this Order;

21 D. Conserve, hold, and manage all Receivership assets, and perform all
22 acts necessary or advisable to preserve the value of those assets, in order to prevent
23 any irreparable loss, damage, or injury to consumers or to creditors of the
24 Receivership Defendants, including, but not limited to, obtaining an accounting of
25 the assets and preventing transfer, unauthorized withdrawal, or misapplication of
26 assets;

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E. Liquidate any and all assets owned by or for the benefit of the Receivership Defendants as the Receiver deems to be advisable or necessary;

F. Enter into or break contracts and purchase insurance as the Receiver deems to be advisable or necessary;

G. Prevent the inequitable distribution of assets and determine, adjust, and protect the interests of consumers who have transacted business with the Receivership Defendants;

H. Manage and administer the business of the Receivership Defendants until further order of this Court by performing all incidental acts that the Receiver deems to be advisable or necessary, which includes retaining, hiring, or dismissing any employees, independent contractors, or agents;

I. Choose, engage, and employ, with prior approval of the Court, attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable and necessary in the performance of duties and responsibilities under the authority granted by this Order. The Receiver may engage the services of the law firm which the Receiver is a member;

J. Make payments and disbursements from the Receivership estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Receivership Defendants prior to the date of entry of this Order, except payments that the Receiver deems necessary or advisable to preserve assets of the Receivership

1 L. Institute, defend, compromise, adjust, appear in, intervene in, or
2 become party to any actions or proceedings in state, federal, or foreign courts,
3 including actions or proceedings against Receivership Defendant or against the
4 Receiver in his role as Receiver, that the Receiver deems necessary or advisable to
5 preserve or recover the assets of the Receivership Defendants or to carry out the
6 Receivers responsibilities under this Order;

7 M. Conduct the business of the Receivership Defendants in such manner,
8 to such extent, and for such duration as the Receiver may in good faith deem to be
9 necessary or appropriate, *provided, however*, that the continuation and conduct of
10 the business, if done at all, is conditioned upon the Receiver's good faith
11 determination that the business can be lawfully operated at a profit using the
12 assets of the receivership estate;

13 N. Take depositions, issue interrogatories, and issue subpoenas to obtain
14 information and documents and records relevant to the Receivership Defendants
15 using the schedule set forth in Section XXI, below;

16 O. Open one or more bank accounts in the Central or Southern District of
17 California as designated depositories for funds of the Receivership Defendants.
18 The Receiver shall deposit all funds of the Receivership Defendants in such a
19 designated account and shall make all payments and disbursements from the
20 receivership estate from such account(s);

21 P. Maintain accurate records of all receipts and expenditures that he
22 makes as Receiver; and,

23 Q. Maintain the chain of custody of all Defendants' assets, documents,
24 property, and records in his possession; and,

25 R. Cooperate with reasonable requests for information or assistance from
26 any state or federal law enforcement agency.

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1 from the assets of the Receivership Defendants. The Receiver shall file with the
2 Court and serve on the parties periodic requests for the payment of such reasonable
3 compensation, with the first such request filed no more than sixty (60) days after
4 the date of the TRO. The Receiver shall not increase the hourly rates used as the
5 bases for such fee applications without prior approval of the Court.

6
7 XVIII. RECEIVER'S REPORTS

8 IT IS FURTHER ORDERED THAT the Receiver shall report to this
9 Court from time to time regarding: (1) the steps taken by the Receiver to
10 implement the terms of this Order; (2) the value of all liquidated and unliquidated
11 assets of the Receivership Defendants; (3) the sum of all liabilities of the
12 Receivership Defendants; (4) the Receiver's assessment of whether the business
13 can be operated profitably and legally; (5) any future steps the Receiver
14 recommends; and (6) any other matters which the Receiver believes should be
15 brought to the Court's attention *provided, however*, that if any of the required
16 information would hinder the Receiver

1 A. Except by leave of this Court, ~~due~~ pendency of the Receivership
2 created by this Order, Defendants, ~~Receivership~~ Defendants, and all other persons
3 and entities are stayed from taking any action to establish or enforce any claim,
4 right, or interest for, against, in, on behalf or in the name of, any Receivership
5 Defendant or any of their subsidiaries, affiliates, partnerships, assets, or
6 documents, or the Receiver or the Receiver's duly authorized agents acting in their
7 capacities as such, including, ~~but~~ not limited to, the following:

8 1. Commencing, prosecuting, ~~conting~~ entering, or enforcing
9 any suit or proceeding, except that such actions may be filed to toll any
10 applicable statute of limitations;

11 2. Accelerating the due date ~~of~~ any obligation or claimed
12 obligation; filing or enforcing any ~~lien~~; taking or attempting to take
13 possession, custody, or control of ~~asset~~; attempting to foreclose, forfeit,
14 alter, or terminate any ~~interest~~ in any asset, when ~~the~~ such acts are part of a
15 judicial proceeding, are ~~acts~~ self-help, or otherwise;

16 3. Executing, issuing, serving, or
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1. The commencement or continuation of a criminal action or proceeding;
2. The commencement or continuation of an action or proceeding by a bar association to enforce its police or regulatory powers;
3. The commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power;
4. The enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or
5. The issuance to a Receiver-Defendant of a notice of tax

1 IT IS FURTHER ORDERED THAT each Defendant shall immediately
2 provide a copy of this Order to each of that Defendant's officers, directors, agents,
3 servants, employees, attorneys, salespersons, independent contractors, electronic
4 data hosts, computer technology provider, spouse, and children over age 18 years
5 and shall, within seven (7) 15

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