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11 Attorneys for Receiver
12 KRISTA L. FREITAG

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION

16 Consumer Financial Protection Bureau
and Maria T. Vullo, Superintendent of
17 Financial Services of the State of
New York,

18 Plaintiffs,

19 v.

20 Pension Funding, LLC; Pension
21 Income, LLC; Steven Covey; Edwin
Lichtig; and Rex Hofelter,

22 Defendants.
23

Case No. 8:15-cv-1329

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

Date: May 3, 2019
Time: 10:30 a.m.
Ctrm.: 10A
Judge: Hon. Josephine L. Staton

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on May 3, 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 of
5 Krista L. Freitag ("Receiver"), the Court- appointed permanent receiver for Pension
6 Funding, LLC, Pension Income, LLC, and their subsidiaries, affiliates, and
7 successors-in-interest, including PGR, LLC (collectively, "Receivership Entities"),
8 and her general counsel, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen
9 Matkins"), for approval and payment of fees and expenses ("Applications").

10 The Receiver seeks approval of \$518,271.82, which is composed of the
11 following:

- 12 • \$9,863.67 (\$9,315.45 in fees and \$548.22 in costs) incurred from
13 October 1, 2018 through December 31, 2018, but not yet paid;
- 14 • \$388,549.85 of fees and costs paid on an interim basis;
- 15 • \$91,358.30, as the 20% hold back from the Receiver's eleven interim fee
16 applications;
- 17 • \$28,500 in projected fees and costs to complete the remaining task laid
18 out in the Motion to Conclude; these projected fees and costs are to be
19 paid from the reserve funds established with Motion to Conclude filed
20 concurrently herewith.

21 Allen Matkins seeks approval of \$380,687.37, which includes the following:

- 22 • \$5,749.45 (\$5,560.65 in fees and \$188.80 in costs) incurred from
23 October 1, 2018 through December 31, 2018, but not yet paid;
- 24 • \$292,974.17 (\$279,855 of fees and \$13,119.17 of costs) paid to Allen
25 Matkins pursuant to its eleven interim fee applications;
- 26 • \$69,963.75, as the 20% hold back from Allen Matkins' eleven interim
27 fee applications;

28

- 1 • \$12,000 in projected fees and costs to complete the remaining task laid
2 out in the Motion to Conclude; these projected fees and costs are to be
3 paid from the reserve funds established with Motion to Conclude filed
4 concurrently herewith.

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

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

11
12 Dated: February 27, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward G. Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA L. FREITAG

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