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7 THOMAS C. HEBRANK

8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

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11 SECURITIES AND EXCHANGE  
COMMISSION,

12 Plaintiff,

13 v.

14 LOUIS V. SCHOOLER and FIRST  
15 FINANCIAL PLANNING  
CORPORATION d/b/a WESTERN  
16 FINANCIAL PLANNING  
CORPORATION,

17 Defendants.  
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Case No. 3:12-cv-02164-GPC-JMA

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

**(A) AUTHORITY TO CONDUCT  
ORDERLY SALE OF GENERAL  
PARTNERSHIP PROPERTIES;**

**(B) APPROVAL OF PLAN OF  
DISTRIBUTING RECEIVERSHIP  
ASSETS; AND**

**(C) APPROVAL OF PROCEDURES  
FOR THE ADMINISTRATION OF  
INVESTOR CLAIMS**

Date: April 22, 2016  
Time: 1:30 p.m.  
Ctrm.: 2D  
Judge: Hon. Gonzalo P. Curiel

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that on April 22, 2016, at 1:30 p.m. in  
3 Courtroom 2D of the United States District Court, Southern District of California,  
4 located at 221 West Broadway, San Diego, California 92101, Thomas C. Hebrank  
5 ("Receiver"), the Court-appointed receiver for First Financial Planning Corporation  
6 d/b/a Western Financial Planning Corporation ("Western"), its subsidiaries and the  
7 general partnerships organized by Western, will, and hereby does, move this Court  
8 for an order (a) authorizing the Receiver to conduct an orderly sale of General  
9 Partnership properties, (b) approving a plan of distributing receivership assets, and  
10 (c) approving procedures for the administration of investor claims ("Motion").

11 This Motion is based upon this Notice, the accompanying Memorandum of  
12 Points and Authorities, all pleadings and papers on file in this action, and upon such  
13 other matters as may be presented to the Court at the time of hearing.

14 **Procedural Requirements:** If you oppose the Motion, you are required to  
15 file your written opposition with the Office of the Clerk, United States District  
16 Court, Southern District of California, 333 West Broadway, Suite 420, San Diego,  
17 California 92101, and serve the same on the undersigned no later than 14 calendar  
18 days prior to the hearing date. An opposing party's failure to file an opposition to  
19 any motion may be construed as consent to the granting of the motion pursuant to  
20 Civil Local Rule 7.1(f)(3)(c).

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22 Dated: February 4, 2016

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

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24 By:           /s/ Ted Fates          

25 TED FATES  
26 Attorneys for Receiver  
27 THOMAS C. HEBRANK  
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