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9 Attorneys for Receiver
THOMAS C. HEBRANK

11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

14 Plaintiff,

15 v.

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

19 Defendants.

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

**NOTICE OF RECEIVER'S INTENT
TO FILE OPPOSITION TO THE:**

**(A) INVESTOR GROUP'S
EX PARTE APPLICATION FOR AN
ORDER EXTENDING TIME TO
FILE AN OPPOSITION TO THE
RECEIVER'S APRIL 29, 2016
MOTION FOR ORDER
AUTHORIZING SALE OF
GENERAL PARTNERSHIP ASSETS
[DOC. 1181] BY A PERIOD OF
30 DAYS; AND**

**(B) JOINDER TO EX PARTE
APPLICATION FOR AN ORDER
EXTENDING TIME TO FILE AN
OPPOSITION TO THE RECEIVER'S
APRIL 29, 2016 MOTION FOR
ORDER AUTHORIZING SALE OF
GENERAL PARTNERSHIP ASSETS
[DOC. 1181] BY A PERIOD OF
30 DAYS FILED BY SUSAN
GRAHAM, ET AL. (DKT. NO. 1212)**

Ctrm.: 2D
Judge: Hon. Gonzalo P. Curiel

1 Thomas C. Hebrank ("Receiver"), Court-appointed receiver for First Financial
2 Planning Corporation d/b/a Western Financial Planning Corporation ("Western"),
3 and its subsidiaries and the General Partnerships listed on Schedule 1 to the
4 Preliminary Injunction Order entered on March 13, 2013 (collectively,
5 "Receivership Entities"), hereby notifies the Court that he intends to file a formal
6 opposition to the Investor Group's¹ *Ex Parte* Application ("Application") for an
7 Order Extending Time to File an Opposition to the Receiver's April 29, 2016
8 Motion for Order Authorizing Sale of General Partnership Assets [Doc. 1181] by a
9 Period of 30 Days (Dkt. No. 1211) and the Joinder to *Ex Parte* Application for an
10 Order Extending Time to File an Opposition to the Receiver's April 29, 2016
11 Motion for Order Authorizing Sale of General Partnership Assets [Doc. 1181] by a
12 Period of 30 Days filed by Susan Graham, *et al.* (Dkt. No. 1212). The Application
13 concerns the Investor Group's opposition due on April 8, 2016. The Receiver will
14 file his opposition to the Application on Monday, March 28, 2016.

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Dated: March 23, 2016

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ David Zaro
DAVID ZARO
Attorneys for Receiver
THOMAS C. HEBRANK

¹ The totality of the members of the Investor Group are listed in the Application (Dkt. No. 1211).

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PROOF OF SERVICE

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and am not a party to this action. My business address is 501 West Broadway, 15th Floor, San Diego, California 92101-3541.

On March 23, 2016, I served the within document(s) described as:

- **NOTICE OF RECEIVER'S INTENT TO FILE OPPOSITION TO THE INVESTOR GROUP'S *EX PARTE* APPLICATION FOR AN ORDER EXTENDING TIME TO FILE AN OPPOSITION TO THE RECEIVER'S APRIL 29, 2016 MOTION FOR ORDER AUTHORIZING SALE OF GENERAL PARTNERSHIP ASSETS [DOC. 1181] BY A PERIOD OF 30 DAYS**

on the interested parties in this action by:

BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF"): the foregoing document(s) will be served by the court via NEF and hyperlink to the document. On March 23, 2016, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addressed indicated below:

- Gary J. Aguirre - gary@aguirrelawapc.com; maria@aguirrelawapc.com
- Lynn M. Dean - deanl@sec.gov; larofiling@sec.gov; berryj@sec.gov; irwinma@sec.gov; cavallones@sec.gov
- Timothy P. Dillon - tdillon@dillongerardi.com; smiller@dillongerardi.com; rabrera@dillongerardi.com; CBeal@dillongerardi.com
- Philip H. Dyson - phildysonlaw@gmail.com; jldossegger2@yahoo.com; phdtravel@yahoo.com
- Edward G. Fates - tfates@allenmatkins.com; bcrfilings@allenmatkins.com; jholman@allenmatkins.com
- Susan Graham - gary@aguirrelawapc.com
- Eric Hougen - eric@hougenlaw.com
- Sara D. Kalin - kalins@sec.gov; irwinma@sec.gov

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 23, 2016, at San Diego, California.

David Zaro	/s/ David Zaro
(Type or print name)	(Signature of Declarant)