

1 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
2 DAVID R. ZARO (BAR NO. 124334)
865 South Figueroa Street, Suite 2800
3 Los Angeles, California 90017-2543
Phone: (213) 622-5555
4 Fax: (213) 620-8816
E-Mail: dzaro@allenmatkins.com

5 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
6 EDWARD G. FATES (BAR NO. 227809)
One America Plaza
7 600 West Broadway, 27th Floor
8 San Diego, California 92101-0903
Phone: (619) 233-1155
9 Fax: (619) 233-1158
E-Mail: tfates@allenmatkins.com

10 Attorneys for Receiver
11 THOMAS C. HEBRANK

12 **UNITED STATES DISTRICT COURT**
13 **SOUTHERN DISTRICT OF CALIFORNIA**

14
15 SECURITIES AND EXCHANGE
COMMISSION,

16 Plaintiff,

17 v.

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

21 Defendants.
22

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

**NOTICE OF RECEIPT OF
QUALIFIED OVERBID
REGARDING MOTION FOR
(A) APPROVAL OF SALE OF
WASHOE III PROPERTY AND
(B) AUTHORITY TO PAY
BROKER'S COMMISSION**

Date: March 12, 2021
Time: 1:30 p.m.
Ctrm.: 2D
Judge: Hon. Gonzalo P. Curiel

23
24 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
25 **COUNSEL OF RECORD:**

26 **PLEASE TAKE NOTICE** that Thomas C. Hebrank ("Receiver"), the Court-
27 appointed receiver for First Financial Planning Corporation d/b/a Western Financial
28 Planning Corporation ("Western"), its subsidiaries and the General Partnerships

1 listed in Schedule 1 to the Preliminary Injunction Order entered on March 13, 2013
2 (collectively, "Receivership Entities"), hereby submits this Notice of Receipt of
3 Qualified Overbid Regarding Motion for (A) Approval of Sale of Washoe III
4 Property and (B) Authority to Pay Broker's Commission ("Motion").

5 In his Motion, the Receiver proposed a deadline for submission of qualified
6 overbids for the Washoe III Property no later than February 22, 2021. The Receiver
7 posted the sale motion on the receivership website www.ethreadvisors.com (see the
8 "SEC Case Docs" tab), published notice of the sale in the Reno Journal-Gazette as
9 required by 28 U.S.C. section 2002, and has, through his broker, continued to
10 market the property and notify potential purchasers about the opportunity to submit
11 an overbid and the proposed deadline to do so. As a result, two qualified overbids
12 were received.

13 The Receiver, through his broker, has obtained the consent of the original
14 buyer and the qualified overbidders to conduct the live auction via Zoom call on
15 February 26, 2021. Once the auction has been completed, the Receiver will file a
16 notice of the auction results and request that the sale to the winning bidder be
17 approved.

18
19 Dated: February 23, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
THOMAS C. HEBRANK

20
21
22
23
24
25
26
27
28