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Attorneys for David K. Broadbent as Court-Appointed Receiver

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

FEDERAL TRADE COMMISSION; and
UTAH DIVISION OF CONSUMER
PROTECTION,

Plaintiffs,

vs.

ZURIXX, LLC, a Utah limited liability
company; CARLSON DEVELOPMENT
GROUP, LLC, a Utah limited liability
company; CJ SEMINAR HOLDINGS, LLC, a
Utah limited liability company; ZURIXX
FINANCIAL, LLC, a Utah limited liability
company; CHRISTOPHER A. CANNON,
individually and as an officer of ZURIXX,
LLC; JAMES M. CARLSON, individually and
as an officer of ZURIXX, LLC; and JEFFREY
D. SPANGLER, individually and as an officer
of ZURIXX, LLC,

Defendants.

**AMENDMENT TO RECEIVER'S
MOTION TO APPROVE THE SALE OF
CERTAIN PERSONAL PROPERTY, AND
TO APPROVE SALE FREE AND CLEAR
OF LIENS WITH VALID LIENS TO
ATTACH TO PROCEEDS**

Case No. 2:19-cv-00713

David K. Broadbent, as receiver (the "Receiver") for Defendants Zurixx, LLC and related entities (collectively, "Zurixx"), hereby amends his Motion to Approve the Sale of Certain

Personal Property, and to Approve Sale Free and Clear of Liens with Valid Liens to Attach to Proceeds (Dkt. No. 63; the “Motion”).

With his Motion, the Receiver seeks, in part, approval to sell Personal Property, but with respect to the sale of “servers and computers,” he originally requested such authorization only if he obtains consent from the Plaintiffs and the individual Defendants to conduct such sale. This request recognizes the Receiver’s duty to preserve information regarding the receivership entities, as well as the parties’ interest in having access to such information. The Receiver amends the Motion to request that the limitation on his authority to sell Personal Property apply to “servers and *computer hard drives*,” as opposed to “servers and computers” generally. The Receiver believes he will be able to remove the hard drives from computers and sell the shell computers without delay, while retaining the hard drives and preserving the essential information. Consistent with the original Motion, the Receiver will not sell hard drives without the consent of the parties in this case or further order of the Court.

RESPECTFULLY SUBMITTED this 3rd day of December, 2019.

HOLLAND & HART LLP

/s/ Doyle S. Byers

Doyle S. Byers

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