

HOLLAND & HART LLP  
Doyle S. Byers, #11440  
Cory A. Talbot, #11477  
Engels J. Tejada, #11427  
Chelsea J. Davis, #16436  
222 S. Main Street, Suite 2200  
Salt Lake City, Utah 84101  
Telephone: (801) 799-5800  
Facsimile: (801) 799-5700

*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; BRAND MANAGEMENT HOLDINGS, LLC, a Delaware limited liability company; CAC INVESTMENT VENTURES, LLC, a Puerto Rico limited liability company; CARLSON DEVELOPMENT GROUP UTAH, a Utah limited liability company; CARLSON DEVELOPMENT GROUP PUERTO RICO, a Puerto Rico limited liability company; CJ SEMINAR HOLDINGS, LLC, a Utah limited liability company; DORADO MARKETING AND MANAGEMENT, LLC, f/k/a Zurixx, LLC, a Puerto Rico limited liability company; JSS INVESTMENT VENTURES, LLC, a Utah limited liability company; JSS TRUST, individually and as an

**MOTION TO EXTEND CLAIM  
DEADLINE UNDER THE STIPULATED  
ORDER FOR QUALIFIED TURNOVER  
OF RESERVE FUNDS (PRIORITY  
PAYMENT SYSTEMS)**

Case No. 2:19-cv-00713-DAK-DAO

owner of JSS INVESTMENT VENTURES, LLC; ZURIXX FINANCIAL UTAH, a Utah limited liability company; ZURIXX FINANCIAL PUERTO RICO, a Puerto Rico limited liability company; CRISTOPHER A. CANNON, individually and as an officer of ZURIXX, LLC; JAMES M. CARLSON, individually and as an officer of ZURIXX, LLC; JEFFREY D. SPANGLER, individually and as an officer of ZURIXX, LLC; and GERALD D. SPANGLER, a trustee for the JSS TRUST,

Defendants.

The Court-Appointed Receiver David K. Broadbent (the “Receiver”) requests that the Court extend the deadline set by this Court’s Stipulated Order for Qualified Turnover of Reserve Funds (Priority Payment Systems) (the “Turnover Order”; Dkt. No. 136) for Richardson Law Group (“RLG”) to file claims, if it has any, related to the Reserve Funds\* turned over to the Receiver by Priority Payment Systems pursuant to the Turnover Order.

The Turnover Order instructed the Receiver to serve the Turnover Order on RLG. The Receiver’s counsel did so on May 21, 2020. The Turnover Order gives RLG “45 days after service of this Order [the “Claim Deadline”] to file a claim with the Court to assert any claims it may have to the Reserve Funds.” (Turnover Order at ¶ 5.) Given that service was effectuated on May 21, 2020, the Claim Deadline is July 6, 2020.

The Receiver has been in communication with John M. Kennedy, who was appointed by the Superior Court of California to serve as the Practice Administrator of RLG, regarding the

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\* Unless otherwise defined, capitalized terms shall have the meanings set out in the Court’s Turnover Order.

Reserve Funds at issue, and the Receiver and Mr. Kennedy desire a brief extension of the Claim Deadline to allow them to pursue a possible resolution of any dispute potentially without the need for RLG to file a claim. Therefore, the Receiver requests that the Court extend the Claim Deadline to July 27, 2020. A proposed form of order is attached.

RESPECTFULLY SUBMITTED this 6th day of July, 2020.

HOLLAND & HART LLP

/s/ Doyle S. Byers

Doyle S. Byers

Cory A. Talbot

Engels J. Tejada

Chelsea J. Davis

*Attorneys for David K. Broadbent as the Court-appointed Receiver*

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**ORDER EXTENDING CLAIM  
DEADLINE UNDER THE STIPULATED  
ORDER FOR QUALIFIED TURNOVER  
OF RESERVE FUNDS (PRIORITY  
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Case No. 2:19-cv-00713-DAK-DAO

owner of JSS INVESTMENT VENTURES, LLC; ZURIXX FINANCIAL UTAH, a Utah limited liability company; ZURIXX FINANCIAL PUERTO RICO, a Puerto Rico limited liability company; CRISTOPHER A. CANNON, individually and as an officer of ZURIXX, LLC; JAMES M. CARLSON, individually and as an officer of ZURIXX, LLC; JEFFREY D. SPANGLER, individually and as an officer of ZURIXX, LLC; and GERALD D. SPANGLER, a trustee for the JSS TRUST,

Defendants.

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The Court-Appointed Receiver David K. Broadbent (the “Receiver”) filed a Motion to Extend Claim Deadline Under the Stipulated Order for Qualified Turnover of Reserve Funds (Priority Payment Systems) requesting this Court to extend the deadline (the “Claim Deadline”) imposed by this Court’s Stipulated Order for Qualified Turnover of Reserve Funds (Priority Payment Systems) (the “Turnover Order”; Dkt. No. 136) for Richardson Law Group (“RLG”) to file claims, if it has any, related to the Reserve Funds turned over to the Receiver by Priority Payment Systems.

Having considered the Motion, and good cause appearing, the Court HEREBY ORDERS as follows:

1. The Motion is GRANTED and APPROVED; and

2. The Turnover Order is amended to extend the Claim Deadline to July 27, 2020.

The Turnover Order otherwise remains unchanged.

**SO ORDERED** this \_\_\_\_ day of July, 2020.

BY THE COURT:

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Honorable Dale A. Kimball  
U.S. District Court Judge