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*Attorneys for Michael Grow and Dan Altamirano*

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

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<p>FEDERAL TRADE COMMISSION and UTAH DIVISION OF CONSUMER PROTECTION,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>ZURIXX, LLC, et al.,</p> <p style="text-align: center;">Defendants.</p>	<p><b>OBJECTIONS TO MOTION TO LIFT STAY IN ANCILLARY CASES AND TO ALLOW THE RECEIVER TO FILE ADDITIONAL ANCILLARY CASES</b></p> <p>Case No. 2:19-cv-00713-DAK-DAO</p> <p>District Judge Dale A. Kimball</p> <p>Magistrate Judge Daphne A. Oberg</p>
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Non-parties Michael Grow (“Grow”) and Daniel Altamirano (“Altamirano”), by and through their undersigned counsel of record, hereby object to the Motion to Lift Stay in Ancillary Cases and to Allow the Receiver to File Additional Ancillary Cases [Dckt. No. 423] (the “Motion to Lift Stay”).

**OBJECTIONS**

Grow and Altamirano are non-parties who have been sued in ancillary lawsuits by David K. Broadbent as the receiver for Zurixx, LLC and various related parties (the “Receiver”). The

Receiver's ancillary lawsuit against Grow is Case No. 2:20-cv-548; the Receiver's ancillary lawsuit against Altamirano is Case No. 2:20-cv-544. Both of these ancillary lawsuits were stayed and administratively closed pursuant to the Court's Memorandum Decision and Order dated November 8, 2021 [Dckt. No. 333]. Now the Receiver asks the Court, on an expedited basis and without proper notice to Grow or Altamirano, to lift the stay in those ancillary lawsuits.

Grow and Altamirano object to the Motion to Lift Stay. As their objections, they incorporate the objections, arguments, and authorities cited in the Objection to Receiver's Motion to Lift Stay filed by non-party Matt Davis on October 31, 2022 [Dckt. No. 425]. The Court should deny the Motion to Lift Stay.

DATED this 1st day of November 2022.

MITCHELL BARLOW & MANSFIELD, P.C.

/s/ Andrew V. Collins  
J. Ryan Mitchell  
Andrew V. Collins  
*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I certify that on this 1st day of November 2022, I caused a true and correct copy of the foregoing **OBJECTIONS TO MOTION TO LIFT STAY IN ANCILLARY CASES AND TO ALLOW THE RECEIVER TO FILE ADDITIONAL ANCILLARY CASES** to be filed via the Court's electronic filing system, which automatically provides notice to counsel of record.

/s/ Andrew V. Collins\_\_\_\_\_