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Attorneys for Permanent Equity Receiver
ROBB EVANS & ASSOCIATES LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

M&T FINANCIAL GROUP, a corporation, also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group,

AMERICAN COUNSELING CENTER CORP., a corporation, also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group, and

SALAR TAHOUR, individually, and as an officer of M&T FINANCIAL GROUP and AMERICAN COUNSELING CENTER CORP.,

Defendants.

Case No. CV-17-6855-ODW(PLAx)

DECLARATION OF GARY OWEN CARIS PURSUANT TO LOCAL RULE 7-19.1 IN SUPPORT OF *EX PARTE* APPLICATION FOR AN ORDER PERMITTING PERMANENT EQUITY RECEIVER TO TRANSMIT INFORMATION REGARDING CONSUMER CLIENTS OF RECEIVERSHIP DEFENDANTS TO THE UNITED STATES DEPARTMENT OF EDUCATION FOR LIMITED PURPOSES

I, Gary Owen Caris, declare:

1. I am an attorney at law duly licensed to practice before all courts of the State of California and the United States District Court for the Central District of California. I am a partner in the law firm of Diamond McCarthy LLP, attorneys of record for the Permanent Equity Receiver ("Receiver") Robb Evans & Associates LLC in the above-captioned matter. This declaration is provided to the Court pursuant to Local Rule 7-19.1. I have personal knowledge of the matters set forth herein, and if I were called upon to testify as to these matters I could and would competently testify thereto.

2. On November 3, 2017 I sent via e-mail to counsel for Plaintiff, Federal Trade Commission ("FTC") and counsel for the Defendants copies of the near-final version of the *Ex Parte* Application for an Order Permitting Permanent Equity Receiver to Transmit Information Regarding Consumer Clients of Receivership Defendants to the United States Department of Education for Limited Purposes ("Ex Parte Application"), together with the as-yet unexecuted Declaration of Brick Kane and the proposed order granting the Ex Parte Application. I indicated in my cover e-mail that I intended to file the Ex Parte Application on Tuesday, November 7, 2017 and requested that counsel advise me, by close of business on Monday, November 6, whether they opposed the Ex Parte Application.

3. On Friday, November 3, 2017, Samuel Levine, counsel for the FTC, advised me by e-mail that the FTC did not oppose the Ex Parte Application. On Monday, November 6, 2017, Roy Taub, counsel for the Defendants, advised me by e-mail that the Defendants did not oppose the Ex Parte Application.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 7, 2017 at Los Angeles, California.

/s/ Gary Owen Caris

CASE NAME: FEDERAL TRADE COMMISSION V. M&T FINANCIAL GROUP, ET AL.
CASE NO: CV-17-6855-ODW(PLAx)

CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury pursuant to the laws of the State of California that I am a citizen of the United States, over the age of 18 years, and not a party to the within action. My business address is 909 Fannin, Suite 3700, Houston, TX 77010.

On November 7, 2017, I caused to be served the **DECLARATION OF GARY OWEN CARIS PURSUANT TO LOCAL RULE 7-19.1 IN SUPPORT OF *EX PARTE* APPLICATION FOR AN ORDER PERMITTING PERMANENT EQUITY RECEIVER TO TRANSMIT INFORMATION REGARDING CONSUMER CLIENTS OF RECEIVERSHIP DEFENDANTS TO THE UNITED STATES DEPARTMENT OF EDUCATION FOR LIMITED PURPOSES** upon the CM/ECF participants by electronic means.

I declare upon the penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 7, 2017 at Houston, Texas.

/s/ Catherine Burrow