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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. ASCEND CAPVENTURES INC., et al., Defendants.	Case No. 2:24-CV-07660-SPG-JPR **NOTICE OF MOTION AND MOTION FOR ORDER: (1) APPROVING FINAL REPORT AND ACCOUNTING; (2) AUTHORIZING PAYMENT OF FINAL FEE APPLICATION OF RECEIVER AND PROFESSIONALS; (3) ESTABLISHING RESERVE FOR CLOSING RECEIVERSHIP; (4) AUTHORIZING TRANSFER OF RECEIVERSHIP ASSETS TO PLAINTIFF FEDERAL TRADE COMMISSION; (5) AUTHORIZING ABANDONMENT OR DESTRUCTION OF RECORDS; AND (6) CLOSING RECEIVERSHIP AND DISCHARGING AND RELEASING RECEIVER** [Memorandum of Points and Authorities; Declaration of Stephen J. Donell; Final Report and Accounting; Final Fee Application; and [Proposed] Order submitted concurrently herewith] Date: February 25, 2026 Time: 1:30 p.m. Ctrm: 5C Judge Hon. Sherilyn Peace Garnett

TO THE HONORABLE SHERILYN PEACE GARNETT, UNITED STATES DISTRICT JUDGE, AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that, on February 25, 2026, at 1:30 p.m. or as soon thereafter as the matter may be heard in the above-entitled action, before the Honorable Sherilyn Peace Garnett, at the United States District Court for the Central District of California, First Street Courthouse, 350 West 1st Street, Courtroom 5C, 5th Floor, Los Angeles, California 90012, Stephen J. Donell (the "Receiver"), the Court-appointed receiver in the above-entitled action, will and hereby does move (the "Wind-Down Motion") the Court for an Order (1) approving the Receiver's concurrently submitted final report and accounting; (2) authorizing the payment of the fees and expenses presented in the Receiver's and his professionals' concurrently submitted final fee application; (3) establishing a reserve from which the remaining administrative fees and expenses associated with closing the receivership will be paid; (4) authorizing the Receiver to transfer all estate funds remaining after the payment of administrative fees and costs to the plaintiff Federal Trade Commission; (5) authorizing the abandonment or destruction of receivership records; and (6) authorizing the Receiver to undertake and complete those tasks necessary to wind-down and close the receivership, and thereafter discharging and releasing the Receiver.

As reflected in the accompanying Memorandum of Points and Authorities, the Receiver has determined, in his reasonable business judgment, that his duties under the Court's orders have been satisfied, and that the costs of continuing the present receivership now likely outweigh any potential benefits. On that basis, the Receiver believes that it is now appropriate to pay outstanding fees and expenses, set aside a reserve for the payment of the fees and expenses that he and his professionals expect to incur while winding down the receivership, remit the remaining receivership assets to the plaintiff Federal Trade Commission, attend to various other final

administrative tasks, wind-down and close the receivership case, and be discharged and released.

The Wind-Down Motion is made on the grounds that the Receiver is now prepared to undertake the closing tasks identified in the accompanying Memorandum of Points and Authorities, and thereafter to wind-down and terminate the receivership.

The Wind-Down Motion is based upon this Notice of Motion and Motion, the concurrently filed Memorandum of Points and Authorities and accompanying declaration of the Receiver, the documents and pleadings already on file in this action, and upon such further oral and documentary evidence as may be presented at the time of the hearing of this Wind-Down Motion.

Dated: January 27, 2026

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
JOSHUA A. DEL CASTILLO
MATTHEW D. PHAM
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By: */s/ Alphamorlai L. Kebeh*
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