С	ase 8:09-cv-00770-DOC-AN	Document 141	Filed 04/26/10	Page 1 of 5	Page ID #:3414	
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4	Attorneys for Plaintiff FEDERAL TRADE COM	MISSION				
.6 .7	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA SOUTHERN DIVISION					
8 9	FEDERAL TRADE CON	MMISSION,) Cas (AN		09-0770 DOC	
20	Plaintif	ff,			NOTICE OF MOTION	
21	V	/.	, = 0 -	R SUMMAR DGMENT		
22	LUCASLAWCENTER "	'INCORPORA '	TED".)	e: May 24, 20)10	
23	et al.,)	e: 8:30 a.m.)10	
23 24	Defend	lants.)	rtroom 9D		
24 25						
26	TO ALL PARTIES	S AND THEIR	ATTORNEYS	OF RECOI	RD:	
20 27	PLEASE TAKE N					
- '		CIICI inut ut t			*******	

28 Federal Trade Commission will move the Court for summary judgment, under

Federal Rule of Civil Procedure 56(c), against Defendants LucasLawCenter
 "incorporated", Future Financial Services, LLC, Paul Jeffrey Lucas, Christopher
 Francis Betts, and Frank Sullivan.

This Motion is based upon this Notice of Motion and Motion; the Memorandum of Points and Authorities in Support of Plaintiff's Motion for Summary Judgment; the Statement of Uncontroverted Facts & Conclusions of Law in Support of Plaintiff's Motion for Summary Judgment; the Exhibits in Support of Plaintiff's Motion for Summary Judgment; all other papers being filed in support of this Motion; evidence and other pleadings previously filed with the Court in this case; and such further argument and evidence as may be presented in writing or at any hearing held on this Motion.

С	ase 8:09-cv-00770-DOC-AN	Document 141	Filed 04/26/10	Page 3 of 5	Page ID #:3416
1 2 3 4			Respectfully WILLARD K General Cour DEANYA T. Regional Dire	K. TOM 1sel KUECKEL	HAN
5 6 7 8 9 10 11 12	Dated: April 26, 2010		<u>/s/ James E.</u> James E. Ellio jelliott Texas Bar No James E. Hur jhunnio Texas Bar No Federal Trade 1999 Bryan S Dallas, Texas (214) 979-93 (214) 979-93 (214) 979-93 (214) 953-30	ott, Attorney @ftc.gov b. 06557100 nnicutt, Attor cutt@ftc.gov b. 24054252 e Commissio Street, Suite 2	ney n 2150
 13 14 15 16 17 18 			John D. Jacol jjacobs California Ba Federal Trade 10877 Wilshi Los Angeles, (310) 824-43 (310) 824-43 Attorneys for FEDERAL T	os (Local Co @ftc.gov ur No. 134154 e Commissio ire Blvd., Ste California 9 43 (Voice) 80 (Facsimil	unsel) 4 n 2. 700 90024 e)
 19 20 21 22 23 24 					
25 26 27 28		3			

CERTIFICATE OF CONFERENCE

1

1				
2	This motion is made following the conference with counsel for the			
3	Defendants, Richard C. Gilbert, pursuant to L.R. 7-3 which took place on April 12,			
4	2010. Mr. Gilbert opposes the motion. Mr. Gilbert can be reached at 714 667-			
5	1038 or 949 201-8925; his office is located at 950 West Seventeenth Street, Suite			
6	D & E, Santa Anna, California 92706-3573.			
7				
8	CERTIFICATE OF SERVICE			
9	I, James E. Elliott, declare:			
10	1. I am a citizen of the United States, and I am an attorney employed by and			
11	representing the Federal Trade Commission. I am not a party to this action.			
12	2. My business address is 1999 Bryan Street, Suite 2150, Dallas, Texas 75201.			
13	3. On April 26, 2010, the foregoing document entitled Plaintiff's Notice of			
14	Motion and Motion for Summary Judgment was served by ECF on the			
15	following:			
16				
17	Richard C. Gilbert			
18	[Attorney for Defendants LucasLawCenter "incorporated", Future Financial Services, LLC, Paul Jeffrey Lucas,			
19	Christopher Francis Betts, and Frank Sullivan]			
20	richardsoal1714@aol.com or rgilbert@gilbertandmarlowe.com			
21	Gary O. Caris			
22	[Attorney for Receiver, Robb Evans & Associates LLC] gcaris@mckennalong.com, pcoates@mckennalong.com			
23	Leglay A. Howard			
24	Lesley A. Hawes [Attorney for Receiver, Robb Evans & Associates LLC]			
25	lhawes@mckennalong.com, pcoates@mckennalong.com			
26	Allen C. Ostergar, III			
27	Allen C. Ostergar , III [Attorney for Electronic Case Systems Inc.] aostergar@ostergar.com			
28				

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 26th day of April, 2010, at Dallas, Texas.

<u>/s/ James E. Elliott</u> James E. Elliott