

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION
and STATE OF GEORGIA,

Plaintiffs,

v.

LAPTOP & DESKTOP REPAIR, LLC,
a Nevada limited liability company, also
d/b/a cashforiphones.com,
cashforlaptops.com, ecyclebest.com,
smartphonetraders.com, sell-your-
cell.com; and VADIM OLEGOVICH
KRUCHININ, also a/k/a Vadim
Kruchin, David Kruchin, David Vadim
Kruchin, Dave Kruch, as the owner and
an officer of Defendant Laptop &
Desktop Repair, LLC,

Defendants.

Case No. 1:16-CV-3591-AT

RECEIVER'S MOTION TO EXPAND THE RECEIVERSHIP

COMES NOW Hays Financial Consulting LLC and S. Gregory Hays, (collectively the "Receiver") and herewith moves this Court for an Order expanding the Receivership to include an entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that

or those entity(ies) including, but not limited to, real property, claims, causes of action, contract rights, leases, bank accounts and cash. In particular, the Receiver requests that the Receivership be expanded to include real estate located at 84 Coney Island Drive, Sparks, Nevada which is the Receivership Defendant's primary place of business, which was acquired by Coney Island 84 and which is where its assets and business records are currently housed (the "Coney Island Drive Building").

The Receiver was initially appointed on September 26, 2016, in the Temporary Restraining Order [ECF No. 9] entered in the above-captioned case. This Court appointed the Receiver for the business activities of the receivership defendant Laptop & Desktop Repair, LLC ("Receivership Defendant"). The Court reappointed the Receiver in the Stipulated Preliminary Injunction Order entered on October 5, 2016 [ECF No. 14.].

For the reasons more fully set forth in the "*Memorandum in Support of the Receiver's Motion to Expand the Receivership*" and the "*Declaration of S. Gregory Hays*" which are filed contemporaneously herewith and in support hereof, the expansion of the Receivership to include the entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that or those entity(ies) including, but not limited to the Coney Island Drive

Building, other real property, claims, causes of action, contract rights, leases, bank accounts and cash of Coney Island 84 is just and proper under the circumstances of this Case and necessary for the Receiver to discharge the duties and obligations assigned to him by this Court.

In addition to the Memorandum and Hays Declaration, this Motion is supported by all pleading and matters of record in this Case.

WHEREFORE, the Receiver respectfully requests that this Court enter an Order expanding the Receivership established in the Stipulated Preliminary Injunction Order to include the entity named Coney Island 84 which may be either or both a corporation and a limited liability company, and any and all assets of that or those entity(ies) including, but not limited to the Coney Island Drive Building, other real property, claims, causes of action, contract rights, leases, bank accounts and cash of Coney Island 84 and further requests such additional relief as may be just and proper.

Respectfully submitted this 3rd day of November, 2016.

LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

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CERTIFICATE OF COMPLIANCE

This is to certify that to the best of my knowledge this document has been prepared with one of the font and point selections approved by the Court in LR 5.1B, pursuant to LR 7. Specifically, the above-mentioned document has been prepared using Times New Roman font, 14 point.

This the 3rd day of November, 2016.

LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
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**FEDERAL TRADE COMMISSION)
and STATE OF GEORGIA)**

Plaintiffs.)

v.)

**LAPTOP & DESKTOP REPAIR)
LLC,)
A Nevada Limited Liability)
Company, also)
d/b/a cashforiphones.com,)
cashforlaptops.com, ecyclebest.com,)
smartphonetraders.com, sell-your-)
cell.com; and VADIM OLEGOVICH)
KRUCHININ, also a/k/a Vadim)
Kruchinin, David Kruchinin, David)
Vadim Kruchinin, Dave Kruch, as the)
owner and an officer of Defendant)
Laptop & Desktop Repair, LLC,)**

Defendants

**Civil Action File No:
1:16-cv-3591-AT**

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2016, I electronically filed the *Receiver’s Motion to Expand the Receivership, Memorandum in Support of Receiver’s Motion to Expand the Receivership and Declaration of S. Gregory Hays* with the Clerk of the Court using

CM/ECF. I also certify that the foregoing document is being served on all parties and the persons identified below via transmission of Notice of Electronic Filing generated by *CM/ECF*, which will automatically send email notification of such filing to the counsel of record, or by causing it to be sent via First Class Mail where indicated below:

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This the 3rd day of November, 2016.

LAW OFFICES OF HENRY F. SEWELL JR., LLC

/s/ Henry F. Sewell, Jr.

Henry F. Sewell, Jr.

Georgia Bar No. 636265

Counsel for the Receiver

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