

**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 SECOND MOTION TO EXPAND THE RECEIVERSHIP

COMES NOW Hays Financial Consulting LLC and S. Gregory Hays, (collectively the "Receiver") and herewith moves this Court for a Second Order expanding the Receivership to include certain real property, building and assets

located at 5390 Vista Ridge Way, Reno, Nevada 89523. Title to this real property is held by David Kruchinin, a named Defendant herein (the “Kruchinin Residence”).

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 Second Motion to Expand the Receivership*” and the “*Declaration of Scott Askue*” which are filed contemporaneously herewith and in support hereof, the expansion of the Receivership to include the Kruchinin Residence is just and proper under the circumstances of this Case and necessary for the Receiver to discharge the duties and obligations assigned to the Receiver by this Court.

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

WHEREFORE, the Receiver respectfully requests that this Court enter a Second Order expanding the Receivership established in the Stipulated Preliminary Injunction Order to include the Kruchinin Residence, that this Court authorize the Receiver to take possession of, secure and seek to sell the Kruchinin Residence and to take such actions as are necessary and appropriate to preserve any value in this property and finally requests such additional relief as may be just and proper under the circumstances of this case.

Respectfully submitted this 7th day of April, 2017.

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

Law Offices of Henry F. Sewell, Jr.
Suite 200, 3343 Peachtree Road NE
Atlanta, GA 30326
(404) 926-0053
hsewell@sewellfirm.com

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 7th day of April, 2017.

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

Law Offices of Henry F. Sewell, Jr.
Suite 200, 3343 Peachtree Road NE
Atlanta, GA 30326
(404) 926-0053
hsewell@sewellfirm.com

IN THE 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)
Kruchinin, David Kruchinin, David)
Vadim Kruchinin, Dave Kruch, as the)
owner and an officer of Defendant)
Laptop & Desktop Repair, LLC,)

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

Defendants

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2017, I electronically filed the *Receiver’s Second Motion to Expand the Receivership, Memorandum in Support of Receiver’s Second Motion to Expand the Receivership and Declaration of Scott Askue* 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:

Anna Mirshak Burns
Hans Christian Clausen
Federal Trade Commission-ATL
Atlanta Regional Office
Suite 1500
225 Peachtree Street, NE
Atlanta, GA 30303-1729
Via ECF

Jacquelyn L. Kneidel, Esq.
Assistant Attorney General
Consumer Protection Unit
2 Martin Luther King, Jr. Drive, S.E.
Suite 870, East Tower
Atlanta, GA 30334-4900
Via ECF

Robert J. Angres, Esq.
2650 Friesian Ct.
Reno, NV 89521-6228
Via First Class Mail

Vadim Kruchinin a/k/a David Kruchin
5390 Vista Ridge Way
Reno, NV 89523-1825
Via First Class Mail

Alice Campos Mercado, Esquire
Lemons, Grundy & Eisenberg
6005 Plumas Street, Third Floor
Reno, Nevada 89519
Counsel for Valeria Campos Fuentes
Via First Class Mail

U.S. Bank Home Mortgage
P.O. Box 20005
Owensboro, KY 42304

Richard F. Holley, Esquire
Holley Driggs Walch
400 S. 4th Street, Suite 300
Las Vegas, Nevada 89101
Counsel for US Bank, Leinholder of Record
Via First Class Mail

This the 7th day of April, 2017.

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

Law Offices of Henry F. Sewell, Jr.
Suite 200, 3343 Peachtree Road NE
Atlanta, GA 30326
(404) 926-0053
hsewell@sewellfirm.com