

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

STATE OF GEORGIA ex rel. JOHN D.	)	
SOURS, Administrator of the Fair Business	)	
Practices Act,	)	
	)	CIVIL ACTION FILE
Petitioner,	)	NO. 2012-CV-217825
	)	
v.	)	
	)	
INTERNATIONAL ESTATE BROKERS, LLC	)	
d/b/a WATCH BROKERS and d/b/a	)	
WEBUYWATCHES.COM; and RONALD	)	
L. BERGH, III, individually,	)	
	)	
Respondents.	)	
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**RECEIVER’S MOTION FOR LEAVE TO FILE CERTIFICATE OF  
SERVICE OF NOTICE OF INTERIM ORDER UNDER SEAL**

COMES NOW Christopher J. Tierney, as Receiver (the “*Receiver*”) for International Estate Brokers, LLC d/b/a Watch Brokers and d/b/a webuywatches.com, by and through the undersigned counsel, and respectfully requests leave to file under seal the Certificate of Service of the Notice of Interim Order.

1. On February 8, 2013, this Court entered an Interim Order Approving Notice to Affected Parties and Setting Objection Deadline and Hearing Date on Receiver’s Request for Authority to Enter Into and Consummate Purchase and Sale Agreement (“*Interim Order*”), pursuant to which the Receiver was to notify all affected parties of the Purchase and Sale Agreement and their rights thereunder.

2. On February 11-12, 2013, pursuant to the Interim Order, the Receiver provided notice to all affected parties by email, where the Receiver or his staff had previously confirmed a

working email address, or by United States First Class Mail where no working email address had been found.

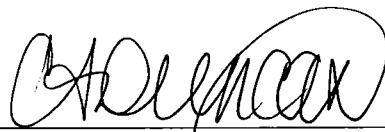
3. The Receiver will file a Certificate of Service detailing all parties who were served with the Notice. This Certificate of Service is replete with the affected parties' confidential e-mail or physical mailing addresses.

4. The affected parties may be subject to embarrassment, or find themselves at risk of contact by charlatans or con artists seeking to take advantage of their plight, if their confidential contact information is made public. Moreover, consumer privacy laws may be implicated as well.

5. In this case, revealing the contact information of these parties serves no purpose. The certificates of service will allow the Receiver to establish who was served and how, and filing it under seal will not affect that goal. Therefore, to safeguard the confidential nature of this information, and to prevent any undue harm to any of the parties from unnecessary disclosure thereof, the Receiver requests that he be permitted to file the Certificate of Service of Notice of Interim Order, and any other certificates or documents in the future which may show such parties' identity or contact information, under seal.

WHEREFORE, the Receiver respectfully requests that the Court grant its Motion for Leave to File the Certificate of Service of the Notice of Interim Order by entering the order attached hereto.

This 13<sup>th</sup> day of February, 2013.



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Receiver*

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L. BERGH, III, individually,	)	
	)	
Respondents.	)	
	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have caused a true and correct copy of the foregoing *Receiver's Motion for Leave to File Certificate of Service of Notice of Interim Order Under Seal* to be served upon counsel of record by placing a copy of the same in the United States Mail with sufficient postage and properly addressed to:

Gregory F. Harley  
Burr Forman LLP  
171 17th St NW  
Suite 1100  
Atlanta, GA 30363

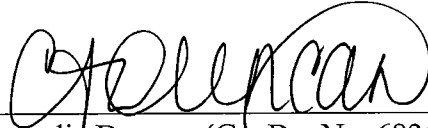
John A. Thomson, Jr.  
Womble Carlyle Sandridge & Rice, LLP  
271 17th Street, N.W.  
Suite 2400  
Atlanta, GA 30363-1017

International Estate Brokers, LLC d/b/a Watch Brokers and d/b/a  
webuywatches.com  
c/o Scott A. Minot  
3562 Piedmont Road, #413  
Atlanta, Georgia 30305

Ronald L. Bergh, III  
5530 Hillgate Crossing  
Alpharetta, Georgia 30005

Ronald L. Bergh, III  
5095 Roswell Road, Unit 109  
Atlanta, Georgia 30305

This 13<sup>th</sup> day of February, 2013.



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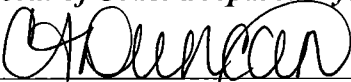
**ORDER GRANTING RECEIVER’S REQUEST FOR LEAVE TO FILE  
CERTIFICATE OF SERVICE OF NOTICE OF INTERIM ORDER UNDER SEAL**

This Court, having read and considered the Motion For Leave to File the Certificate of Service of Notice of Interim Order Under Seal submitted by Christopher J. Tierney, as receiver (the “*Receiver*”) for International Estate Brokers, LLC d/b/a Watch Brokers and d/b/a webbuywatches.com, hereby GRANTS such motion and ORDERS that the Receiver is permitted leave to file under seal the Certificate of Service of the Notice of Interim Order, and any future documents which show the names or contact information of any consumers or victims of fraud.

So Ordered, this \_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
Judge Cynthia D. Wright  
Superior Court of Fulton County

*Form of Order Prepared By:*

  
\_\_\_\_\_  
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