

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NETSPHERE, INC.,	§	
MANILA INDUSTRIES, INC., and	§	
MUNISH KRISHAN,	§	
Plaintiffs.	§	
	§	Civil Action No. 3-09CV0988-F
v.	§	
	§	
JEFFREY BARON, and	§	
ONDOVA LIMITED COMPANY,	§	
Defendants.	§	

RESPONSE TO THE RECEIVER'S SECOND APPLICATION FOR REIMBURSEMENT OF FEES INCURRED BY RECEIVERSHIP PROFESSIONAL JAMES M. ECKELS [DOC#314]

Defendant Jeffrey Baron and make this response and objection to the Receiver's Second Application For Reimbursement Of Fees Incurred by Receivership Professional James M. Eckels [Doc#314], as follows:

1. The fees requested are not reasonable and were not incurred in the ordinary course of business of the LLCs. The fees are clearly duplicative of other fees paid. The argument raised in the Emergency Motion for clarification of receivership order filed by Novo Point LLC and Quantec LLC [Doc#269], is adopted and incorporated by reference herein.

2. Respondent also adopts and incorporate by reference the objections and responses made in Appellant's Limited Objection To The Receiver's First Application For Reimbursement Of Fees Incurred By Receivership Professional

Joshua Cox [Doc#190] and in Appellants' Joint Objection And Response To (1) The Receiver's First Application For Reimbursement Of Fees And Expenses Incurred By The Receiver [Doc#192] and (2) The Receiver's First Application For Reimbursement Of Fees And Expenses Incurred By Gardere Wynne Sewell LLP [Doc#193].

Respectfully submitted,

/s/ Gary N. Schepps
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CERTIFICATE OF SERVICE

This is to certify that this was served on all parties who receive notification through the Court's electronic filing system.

/s/ Gary N. Schepps
Gary N. Schepps