

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

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

APPELLANTS' JOINT RESPONSE TO THE RECEIVER'S FIRST APPLICATION FOR REIMBURSEMENT OF FEES INCURRED BY RECEIVERSHIP PROFESSIONAL JAMES M. ECKELS [DOC#196]

TO THE HONORABLE ROYAL FURGESON, U.S. DISTRICT JUDGE:

COMES NOW, Appellant, defendant Jeffrey Baron and Appellants NovoPoint, LLC and Quantec, LLC and make this joint response and objection to the Receiver's First Application For Reimbursement Of Fees Incurred By Receivership Professional James M. Eckels [Doc#196].

1. Respondents adopt 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].

2. *To the extent that the requested fees are bona fide expenses incurred by the LLC entities in the ordinary course of their business activities, (and so long as the LLC entities are paying the bill), the Court clearly has jurisdiction to ensure the ongoing operation of the LLC entities– as that is the status quo.* Accordingly, no objection is made to that portion of the requested fees which are bona fide expenses incurred by the LLC entities in the ordinary course of business and to be paid for by those entities.

Respectfully submitted,

/s/ Gary N. Schepps

Gary N. Schepps

State Bar No. 00791608

Drawer 670804

Dallas, Texas 75367

(214) 210-5940

(214) 347-4031 Facsimile

**APPELLATE COUNSEL FOR
JEFFREY BARON, NOVO POINT,
LLC, and QUANTEC, LLC**

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