

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**FEDERAL TRADE COMMISSION,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** )  
 )  
 **GLOBAL ACCESS TECHNICAL** )  
 **SUPPORT LLC, et al.** )  
 )  
 **Defendants.** )

**Case No. 4:16-cv-01556-HEA**

**RECEIVER’S MOTION FOR ORDER APPROVING AND CONFIRMING THE SALE  
OF 559 GRAESER ROAD, CREVE COEUR, MISSOURI AND APPROVING SALE  
PROCEDURES**

The Receiver herein moves this Court for entry of the proposed Order Authorizing and Confirming the Sale of 559 Graeser Road, Creve Coeur, Missouri. In support of her motion, the Receiver states as follows:

1. By its Order entered October 4, 2016, the Court appointed Claire M. Schenk as Receiver (the “Receiver”) over Global Access Technical Support LLC and other entities. Subsequently, by its Order entered June 6, 2017, the Court Ordered the Receiver to undertake additional duties pertaining to liquidation activity as described in the June 6, 2017 Order (“the Order”). In particular, the Receiver was directed to complete within one hundred eighty (180) days after entry of the Order, as necessary, the sale of the real property located at 559 Graeser Road, St. Louis, Missouri 63141 (“559 Graeser”). See Order, Subsection III.G and IV.F

2. Pursuant to this Motion, the Receiver seeks authority to sell 559 Graeser to Terry Reznikov (“the Buyer”) under modified sales procedures for the sum of \$270,000, pursuant to the Special Sale Contract dated October 5, 2017 (the “Special Sale Contract”).

3. The Receiver states that the sale is a favorable sale since the Buyer has agreed to pay the price stated in the Listing Agreement and the price stated in the Listing Agreement exceeds the Appraised value.

4. This Motion is made and based on the separate Memorandum of Law and Declaration of Receiver Claire M. Schenk filed contemporaneously herewith.

5. This motion is administrative and not adversarial in nature.

6. The Receiver moves this Court for entry of the proposed Order Authorizing and Confirming the Sale of 559 Graeser Road, Creve Coeur, Missouri, filed simultaneously herewith as **Exhibit A** to this Motion.

Wherefore, the Receiver submits her proposed Order and respectfully requests this Court grant this Motion and enter the relief sought herein, including:

- a. Determining that the notice of this Motion provided by service of this Motion on the parties is adequate and sufficient, and that no further notice is necessary before the Court enters an order granting the requested relief;
- b. Authorizing the Receiver to sell 559 Graeser as requested in this Motion to the Buyer pursuant to the Special Sale Contract;
- c. Authorizing the Receiver to sell 559 Graeser pursuant to modified sale procedures under 28 U.S.C. §§ 2001 and 2002 by which the sale of 559 Graeser pursuant to this Motion and the Special Sale Contract is approved and confirmed without further notice, hearing or overbidding;
- d. Authorizing the Receiver to execute all documents and instruments necessary or convenient to complete, implement, effectuate and close the sale of 559 Graeser

under the terms and conditions of the Special Sale Contract, including but not limited to the deed conveying title to 559 Graeser Road to the Buyer;

- e. Authorizing the Receiver to permit and/or caused to be paid from the proceeds of the sale all ordinary and customary closing costs and expenses required to be paid under the terms of the Special Sale Contract, all commissions provided for in the Special Sale Contract and Listing Agreement, the balance of the Quicken Mortgage, and all other similar expenses in connection with the sale; and
- f. For such other and further relief as may be reasonable or appropriate to effectuate the sale of 559 Graeser to the Buyer pursuant to the Special Sale Contract.

DATED: October 16, 2017

Respectfully Submitted,  
THOMPSON COBURN LLP

By           /s/ Emilee L. Hargis            
Stephen B. Higgins, #25728MO  
Emilee L. Hargis, #69119MO  
One US Bank Plaza  
St. Louis, Missouri 63101  
Phone: (314) 552-6000  
Fax: (314) 552-7000  
shiggins@thompsoncoburn.com  
ehargis@thompsoncoburn.com

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2017, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system to all counsel of record.

          /s/ Emilee L. Hargis

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**FEDERAL TRADE COMMISSION,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** )  
 )  
 **GLOBAL ACCESS TECHNICAL** )  
 **SUPPORT LLC, et al.** )  
 )  
 **Defendants.** )

**Case No. 4:16-cv-01556-HEA**

**ORDER**

This matter is before the Court on the Receiver’s motion for order authorizing and confirming the sale of 559 Graeser Road, Creve Coeur, Missouri and approving sale procedures and related relief ECF No. 115, filed October 16, 2017. As of today’s date, no interested party has filed a response or objection to the instant motion.

The Receiver seeks authority to sell the 559 Graeser Road Property to Terry Reznikov (“the Buyer”) for the sum of \$270,000 pursuant to the Special Sale Contract dated October 5, 2017 (the “Special Sale Contract”). The Receiver further requests that the Court approve modified sale procedures pursuant to 28 U.S.C. §§2001 and 2002 by which this proposed sale is approved without further notice, hearing, or order or opportunity for overbids.

The 559 Graeser Road property is the final asset to be liquidated under the June 6, 2017 Order, and its sale will allow the receivership estate to move towards closure. The Receiver avers that the sale is a favorable sale since the Buyer has agreed to pay the price stated in the Listing Agreement and the price stated in the Listing Agreement exceeds the appraised value.

The Court has carefully reviewed the instant motion and memorandum in support, as well as the Declaration of the Receiver, Claire M. Schenk. In light of the absence of any objections of any interested party to the sale, and given the well-documented support for the sale, the Court finds the proposed sale to be made under modified sale procedures pursuant to 28 U.S.C. §§2001 and 2002 to be reasonable and in the best interests of the receivership estate.

Accordingly,

**IT IS HEREBY ORDERED** that the Receiver's motion requesting that the Court authorize and confirm the sale of 559 Graeser Road [ECF No. 115] be and is **GRANTED**.

**IT IS FURTHER ORDERED** that the Receiver shall sell the 559 Graeser Road Property as requested in the instant motion to the Buyer pursuant to the Special Sale Contract.

**IT IS FURTHER ORDERED** that the Receiver may sell the subject real property pursuant to modified sale procedures under 28 U.S.C. §§2001 and 2002 by which the sale of the subject real property is approved and confirmed without further notice, hearing or overbidding.

**IT IS FURTHER ORDERED** that the Receiver shall execute all documents and instruments necessary or convenient to complete, implement, effectuate and close the sale of the 559 Graeser Road Property under the terms and conditions of the Special Sale Contract, including but not limited to the deed conveying title to the 559 Graeser Road Property to the Buyers.

**IT IS FURTHER ORDERED** that upon closing of the sale, the Receiver shall follow the Court's directive in the June 6, 2017 Order and assign the proceeds of the sale to satisfy any expenses or obligations which the Receiver believes to be reasonably necessary in order to effectuate the sale, including but not limited to, agent's fees or liens upon the property, and the mortgage held by Quicken Loans, account ending in 8603.

**IT IS FINALLY ORDERED**

Dated this \_\_\_ day of \_\_\_\_\_, 2017.

---

UNITED STATES DISTRICT JUDGE