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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **Western Division**

13 **SECURITIES AND EXCHANGE**
14 **COMMISSION,**

15 Plaintiff,

16 vs.

17 **STEVE CHEN, et al.,**

18 Defendants.

Case No. CV15-07425 RGK (PLA)

**PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION'S
NOTICE OF MOTION AND MOTION
FOR SUMMARY JUDGMENT AS TO
LIABILITY AND INJUNCTIVE
RELIEF AGAINST STEVE CHEN**

19 Date: November 28, 2016
Time: 9:00 a.m.
Ctm: 850
20 Judge: Hon. R. Garv Klausner

1 **TO ALL DEFENDANTS AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that Plaintiff Securities and Exchange Commission
3 (“SEC”) will, and hereby does, move for summary judgment as to liability and
4 injunctive relief against Defendant Steve Chen on all claims.

5 The SEC’s motion is based upon the accompanying Memorandum of Points
6 and Authorities; Statement of Uncontroverted Facts and Conclusions of Law; the
7 Declarations of Peter DelGreco, Tom Seaman and Charles Carmona and all exhibits
8 thereto; the filings and records in this action; and any other evidence or argument the
9 SEC may present in support of its motion.

10 This motion is made following the conference of counsel pursuant to L.R. 7-3,
11 which took place on October 19, 2016.

12
13 Respectfully submitted,

14
15 Dated: October 26, 2016

/s/ Douglas M. Miller

16 Douglas M. Miller
17 Donald W. Searles
18 Peter Del Greco
19 Attorneys for Plaintiff
20 Securities and Exchange Commission
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PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On October 26, 2016, I caused to be served the document entitled **PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT AGAINST STEVE CHEN** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 26, 2016

/s/ Amanda Liston

Amanda Liston

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2 **SEC v. Steve Chen, USFIA, Inc., et al**
3 **United States District Court – Central District of California**
4 **Western Division**
5 **Case No. CV 15-07425 (RGK)(GJSx)**
6 **LA-4482**

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10 **SERVICE LIST**

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