

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No: 3:14-CV-00091**

**KENNETH D. BELL, in his capacity as court-  
appointed Receiver for Rex Venture Group, LLC  
d/b/a ZeekRewards.com,**

**Plaintiff,**

**vs.**

**TODD DISNER, in his individual capacity and in  
his capacity as trustee for Kestrel Spendthrift  
Trust; TRUDY GILMOND; TRUDY  
GILMOND, LLC; JERRY NAPIER; DARREN  
MILLER; RHONDA GATES; DAVID  
SORRELLS; INNOVATION MARKETING,  
LLC; AARON ANDREWS; SHARA  
ANDREWS; GLOBAL INTERNET FORMULA,  
INC.; T. LEMONT SILVER; KAREN SILVER;  
MICHAEL VAN LEEUWEN; DURANT  
BROCKETT; DAVID KETTNER; MARY  
KETTNER; P.A.W.S. CAPITAL  
MANAGEMENT LLC; LORI JEAN WEBER;  
and a Defendant Class of Net Winners in  
ZEEKREWARDS.COM;**

**Defendants.**

**OPPOSITION TO CONSOLIDATED MOTION TO DISMISS  
DEFENDANTS' COUNTERCLAIMS**

Defendants Rhonda Gates, Aaron Andrews, Shara Andrews and Innovation Marketing, LLC, respectfully oppose the Receiver's Motion for Class Certification (Docket 68). In support of this opposition, the Defendants adopt the arguments made separately by Defendants Trudy Gilmond, Trudy Gilmond, LLC, Jerry Napier, and Darren Miller (Docket 79), and request that the Court deny to Receiver's motion to certify a class of defendants in this action.

**EDMUNDSON PLLC**

/s/ J. Kevin Edmundson

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*Counsel for Rhonda Gates,  
Innovation Marketing LLC, Aaron  
Andrews & Shara Andrews*

**CERTIFICATE OF SERVICE**

I hereby certify that I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic copies to counsel of record registered to receive electronic service.

This 29th day of August, 2014.

/s/ J. Kevin Edmundson