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11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 **SECURITIES AND EXCHANGE**
COMMISSION,

15 **Plaintiff,**

16 **v.**

17 **PROFIT CONNECT WEALTH**
18 **SERVICES, INC., JOY I. KOVAR, and**
19 **BRENT CARSON KOVAR,**

20 **Defendants.**

Case No. 2:21-cv-01298-JAD-BNW

STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DEFENDANTS BRENT KOVAR AND
JOY KOVAR TO VACATE PROPERTY

21
22 Plaintiff the Securities and Exchange Commission; Geoff Winkler, as the court-
23 appointed receiver of Defendant Profit Connect Wealth Services, Inc.; and
24 Defendants Brent Carson Kovar and Joy I. Kovar submit this Stipulation and Order
25 to extend the deadline by which Brent Kovar and Joy Kovar must vacate the property
26 located at 7043 Calvert Cliffs Street, North Las Vegas, NV 89084 (the “Calvert Cliffs
27 Property”).

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1 **STIPULATION**

2 Whereas, pursuant to the Order (ECF No. 26) entered by the Court on August
3 6, 2021, the Court ordered that “[s]hould the Receiver determine that selling the
4 property is necessary in light of his ongoing assessment of continuation of the
5 business, Defendants J. Kovar and B. Kovar will vacate the property held in the name
6 of Profit Connect at 7043 Calvert Cliffs Street, North Las Vegas, NV 89084, no later
7 than sixty days after the date of entry of this Order”;

8 Whereas, the Receiver informed Brent and Joy Kovar from the commencement
9 of the permanent receivership on August 6, 2021, that he had determined to sell the
10 Calvert Cliffs Property;

11 Whereas, upon reminding Brent and Joy Kovar of their obligation to vacate
12 the Calvert Cliffs Property by October 6, 2021, Brent and Joy Kovar’s then-counsel of
13 record disputed that the Kovars had an obligation to vacate the property without
14 further order of the Court;

15 Whereas, the Receiver maintains that no further court order is required for the
16 Kovars to have vacated the property by October 6, 2021, but would like to avoid
17 motion practice and legal fees on this matter in the best interests of the receivership
18 estate; and

19 Whereas, in light of the foregoing, the parties stipulate as follows:

20 1. Brent Kovar and Joy Kovar shall vacate the Calvert Cliffs Property by
21 no later than November 10, 2021, leaving the Calvert Cliffs Property in good, broom-
22 swept condition;

23 2. When they vacate the Calvert Cliffs Property, Brent Kovar and Joy
24 Kovar shall take with them only their clothing and personal belongings and shall
25 leave all property owned by Profit Connect or purchased with Profit Connect funds in
26 good condition; and

27 3. Brent Kovar and Joy Kovar shall work in good faith with the Receiver
28 to fully catalogue all property owned by Profit Connect or purchased with Profit

1 Connect funds located at the Calvert Cliffs Property, including by providing the
2 Receiver and his designees and counsel reasonable access to the Calvert Cliffs
3 Property.

4 Dated: October 11, 2021

5 SECURITIES & EXCHANGE COMMISSION

BRENT CARSON KOVAR

6 By: Kathryn C. Wanner
7 Kathryn C. Wanner, Esq.
8 Teri M. Melson, Esq.
444 S. Flower Street, Suite 900
Los Angeles, California 90071

Brent Carson Kovar

Appearing in pro per

9 *Attorneys for Plaintiff*
10 *Securities & Exchange Commission*

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JOY I. KOVAR

12 By: /s/ Maria A. Gall
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Joy I Kovar

Appearing in pro per

15 *Attorneys for Receiver*
16 *Geoff Winkler*

17 **ORDER**

18 IT IS SO ORDERED:

19
20 _____
U.S. District Judge Jennifer A. Dorsey

21
22 DATED: _____
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28

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