

1980 FESTIVAL PLAZA DRIVE, SUITE 900 LAS VEGAS, NEVADA 89135 BALLARD SPAHR LLP

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STIPULATION

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

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

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

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

Brent Kovar and Joy Kovar shall vacate the Calvert Cliffs Property by
 no later than November 10, 2021, leaving the Calvert Cliffs Property in good, broom 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

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

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	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: <u>Kathryn C. Wanner</u> Kathryn C. Wanner, Esq. Brent Canson Kovan
	7	Teri M. Melson, Esq. 444 S. Flower Street, Suite 900 <i>Appearing in pro per</i>
	8	Los Angeles, California 90071
	9	Attorneys for Plaintiff Securities & Exchange Commission
	10	Securities & Exchange Commission
	11	BALLARD SPAHR LLP JOY I. KOVAR
	12	By: <u>/s/ Maria A. Gall</u>
-7070	13	Maria A. Gall, Esq. Nevada Bar No. 14200 1980 Fastivel Plaza Drive Suite 900
(702) 471	14	1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135Appearing in pro per
7000 FAX (702) 471-7070	15	Attorneys for Receiver Geoff Winkler
(702) 471-7	16	Geoli Willkier
C	17	ORDER
	18	IT IS SO ORDERED:
	19	Todes
	20	U.S. District Judge Jennifer A. Dorsey
	21	10-14-2021
	22	DATED:
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