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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

RALPH T. IANNELLI and ESSEX  
CAPITAL CORP.,

Defendants.

Case No. 2:18-cv-05008-FMO-AFM

[PROPOSED] ORDER GRANTING  
MOTION OF RECEIVER, GEOFF  
WINKLER, FOR ORDER:  
(1) APPROVING PROPOSED  
DISTRIBUTION PLAN;  
(2) APPROVING RECOMMENDED  
TREATMENT OF CLAIMS; AND  
(3) AUTHORIZING DISTRIBUTIONS  
ON ALLOWED CLAIMS

Date: January 20, 2022  
Time: 10:00 a.m.  
Ctrm: 6D  
Judge Hon. Fernando M. Olguin

**[PROPOSED] ORDER**

Before this Court is the Motion of Receiver, Geoff Winkler, for Order:

(1) Approving Proposed Distribution Plan; (2) Approving Recommended Treatment  
of Claims; and (3) Authorizing Distributions on Allowed Claims (the "Motion").

By the Motion, Geoff Winkler (the "Receiver"), the permanent receiver for  
Defendant Essex Capital Corporation and its subsidiaries and affiliates (collectively,  
the "Receivership Entities"), requests that the Court: (1) approve his proposed  
distribution plan for allowed claims against the Receivership Entities; (2) approve

1 his recommended treatment of investor and other creditor claims against the  
2 Receivership Entities, including as reflected in **Exhibit 1** to the concurrently filed  
3 Declaration of Geoff Winkler; and (3) authorize him to make distributions on  
4 allowed claims in accordance with his proposed distribution plan.

5 The Motion having been considered, and good cause appearing therefore, this  
6 Court orders as follows:

7 1. The Motion is GRANTED, in its entirety;

8 2. The Receiver's distribution plan, as described in the Motion, is  
9 APPROVED;

10 3. The Receiver's recommended treatment of claims against the  
11 Receivership Entities, as described in the Motion and as reflected in **Exhibit 1** to the  
12 Declaration of Geoff Winkler filed in support of the Motion, is APPROVED; and

13 4. The Receiver is AUTHORIZED to commence making distributions on  
14 allowed claims against the Receivership Entities, at the earliest appropriate  
15 opportunity, on a schedule and in amounts to be determined in the Receiver's  
16 reasonable business judgment.

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18 Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Fernando M. Olguin  
Judge, United States District Court

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**PROOF OF SERVICE**

*Securities and Exchange Commission v. Ralph T. Iannelli and Essex Capital Corporation*  
USDC, Central District of California – Case No. 2:18-cv-05008-FMO-AFM

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

On **December 21, 2021**, I caused to be served on all the parties to this action addressed as stated on the attached service list the document entitled: **[PROPOSED] ORDER GRANTING MOTION OF RECEIVER, GEOFF WINKLER, FOR ORDER: (1) APPROVING PROPOSED DISTRIBUTION PLAN; (2) APPROVING RECOMMENDED TREATMENT OF CLAIMS; AND (3) AUTHORIZING DISTRIBUTIONS ON ALLOWED CLAIMS**

**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 the firm'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.

**OVERNIGHT DELIVERY:** I deposited in a box or other facility regularly maintained by express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelope(s) or package(s) designed by the express service carrier, addressed as indicated on the attached service list, with fees for overnight delivery paid or provided for.

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

**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.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **December 21, 2021** at Los Angeles, California.

/s/ Martha Diaz

Martha Diaz