

JUDY A. MUSGROVE, individually and
as beneficiary of the Mainstar Trust,
Cust. FBO Judy A. Musgrove IRA, et al.,

Plaintiffs,

v.

BROOKLYN CHANDLER WILLY, et al.,

Defendants.

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IN THE DISTRICT COURT

131ST JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

ORDER ON FERRUM INVESTOR CLAIMS PROCEDURES

On April 28, 2026, the Court called for hearing the Receiver’s Motion to Approve Proposed Ferrum Investors Claims Procedures and Bar Date (below, the “Motion”). After considering the Motion, the Court’s records of this case, evidence, and arguments of counsel, the Court concludes that it should grant the Motion and hereby does so.

The Court **ORDERS**:

1. The Motion is **granted**.
2. References in this Order to the “Receiver” mean John Patrick Lowe in his capacity as Receiver under the Order Appointing Receiver signed in this case on January 4, 2024, and the Agreed Order Granting Plaintiffs’ Application to Expand Receivership Powers to a Liquidating Receivership for Ferrum Capital and Ferrum IV LLC signed on July 5, 2024. References in this Order to the “Receivership Estate” mean the estate for the assets, debts, and affairs of Ferrum Capital LLC and Ferrum IV LLC created by those Orders.

3. The Court approves the Investor Claims Notice and the Investor Claim Form included with the Motion and with this Order as Appendices A and B. The terms and conditions stated in the Investor Claims Notice and the Investor Claim Form are hereby incorporated into this Order. The Court orders those terms and conditions. The Receiver is authorized and directed to use the Investor Claims Notice and Investor Claim Form and promptly to send them by U.S. Postal Service first class mail to the persons who the Receiver believes lost money in purchases of or investments in promissory notes from Ferrum Capital LLC or Ferrum IV LLC (together below, "Ferrum"). The Receiver is also authorized to email the Investor Claim Notice and the Investor Claim Form to those for whom the Receiver has email addresses. The Receiver also is authorized and directed to publish this Order, the Investor Claims Notice, and the Investor Claim Form on the internet at the following website of his counsel, www.royallealawoffice.com.

4. The "Investor Claims Bar Date" is September 3, 2026. "Investor Claimants" are persons who hold (or who the Receiver believes may hold) claims to recover from Ferrum or the Receivership Estate based on the loss of money in or from the purchase of or investment in promissory notes sold or issued by Ferrum. "Investor Claims" are those claims by those persons.

5. The Investor Claims Bar Date is the deadline by which the Receiver must have received Investor Claims submitted by Investor Claimants. Investor Claimants must submit their Investor Claims to the Receiver so that the Receiver receives the Claims by 5:00pm on the Investor Claims Bar Date. Except as provided in this Order, Investor Claims not received by the Receiver by 5:00pm on the Bar Date are not timely and will be disallowed. Notwithstanding the previous sentence, the Receiver is hereby authorized

for good cause shown in writing to extend the Investor Claims bar Date for any Investor Claimant who requests such an extension in writing on or before the Investor Claims Bar Date.

6. The procedures for Investor Claimants to submit Investor Claims to the Receiver for recovery of money from the Receiver and/or Ferrum Receivership Estate are the exclusive forum and methods in and by which Investor Claimants may assert claims against Ferrum, the Receiver, or the Ferrum Receivership Estate to recover losses from those purchases or investments. **Investor Claimants are hereby barred and enjoined** from asserting Investor Claims against Ferrum, the Receiver, or the Ferrum Receivership Estate in any forum or manner other than in this Court and in any manner provided in in this Order.

7. The procedures stated in this Order for Investor Claims do not apply to claims by anyone whose claim is not based on the loss of money from the purchase of or investment in a promissory note issued or sold by Ferrum—i.e., by a “Non-Investor Claimant” on a “Non-Investor Claim.” The Court makes a separate Order for procedures for Non-Investor Claims. Nor does this Order apply to claims for payment by persons providing goods or services to the Receiver after January 4, 2024—i.e., to “Administrative Claims.” The Receiver remains authorized to pay Administrative Claims in his discretion as they arise or to require those providing the goods or services to apply to the Court for approval for payment.

8. After the Investor Claims Bar Date (as extended if extended), the Receiver will evaluate the timely Investor Claim Forms and any supporting documents submitted with the Forms and determine the validity of the timely Investor Claims. The Receiver

then will prepare an Investor Claims Report and serve a copy of the Report on each person who submitted a timely Investor Claim. The Investor Claims report may be amended from time to time as appropriate.

9. If any Investor Claim timely submitted to the Receiver under any completed Investor Claim Form is objectionable for any reason, the Receiver will state the Receiver's objection(s) to the Claim in the Investor Claims Report. The Receiver has exclusive standing and authority to object to Investor claims.

10. Investor Claimants will have the opportunity to object to the Investor Claims Report within twenty-one (21) days of service of the Report on them. Holders of Investor Claims subject to an objection by the Receiver will have an opportunity to respond or object to the Receiver's objections stated in the Investor Claims Report within twenty-one (21) days of service of the Report on them.

11. The determinations by the Receiver on Investor Claims not subject to objection are final and binding.

12. The Receiver will attempt to resolve any such objections to an Investor Claim or responses or objections by Investor Claimants to the Receiver's Report or objections to any Investor Claim. If such objections or responses cannot be resolved by the Receiver without Court intervention, the Receiver will present the objections and responses to the Court for final determination.

13. The Receiver is authorized to make payments or distributions on Investor Claims so long as such payments or distributions are noted in an Investor Claims Report filed in the records of the Court.

It is so **ORDERED.**

6/2/2026 1:19:02 pm

Signed on June ____, 2026.



NORMA GONZALES, PRESIDING JUDGE

Submitted by:

/s/ Royal B. Lea, III

Royal Lea

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Norma Gonzales

Presiding Judge

131st Judicial District

Bexar County, Texas