

1 Jarrod L. Rickard, Bar No. 10203  
jlr@skrlawyers.com  
2 Katie L. Cannata, Bar No. 14848  
klc@skrlawyers.com  
3 SEMENZA KIRCHER RICKARD  
10161 Park Run Drive, Suite 150  
4 Las Vegas, Nevada 89145  
Telephone: (702) 835-6803  
5 Facsimile: (702) 920-8669

6 David R. Zaro (admitted *pro hac vice*)  
dzaro@allenmatkins.com  
7 Joshua A. del Castillo (admitted *pro hac vice*)  
jdelcastillo@allenmatkins.com  
8 Matthew D. Pham (admitted *pro hac vice*)  
mpham@allenmatkins.com  
9 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
10 865 South Figueroa Street, Suite 2800  
Los Angeles, California 90017-2543  
11 Telephone: (213) 622-5555  
Facsimile: (213) 620-8816

12 *Attorneys for Receiver Geoff Winkler*

Kara B. Hendricks, Bar No. 07743  
hendricksk@gtlaw.com  
Jason K. Hicks, Bar No. 13149  
hicksja@gtlaw.com  
Kyle A. Ewing, Bar No. 014051  
ewingk@gtlaw.com  
GREENBERG TRAUERIG, LLP  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

19 Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY, *et al.*,

22 Defendants,

23 THE JUDD IRREVOCABLE TRUST, *et al.*,

24 Relief Defendants.

Case No. 2:22-cv-00612-CDS-EJY

**NOTICE OF FILING OF (1) RECEIVER'S  
MOTION FOR ORDER DISMISSING  
BANKRUPTCY CASES (FILED IN CASE  
NO. 2:22-CV-01352-CDS-EJY) AND  
(2) RECEIVER'S MOTION FOR ORDER  
REMANDING ACTION TO STATE COURT  
(FILED IN CASE NO. 2:22-CV-01549-CDS-  
EJY)**

26 ///

27 ///

28 ///

1 **TO THE HONORABLE CRISTINA D. SILVA, UNITED STATES DISTRICT JUDGE,**  
2 **AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that on November 18, 2022, Geoff Winkler (the "Receiver"),  
4 the Court-appointed receiver, filed the *Motion for Order Dismissing Bankruptcy Cases* (the  
5 "Dismissal Motion") in the jointly administered bankruptcy cases captioned as *In re J & J*  
6 *Consulting Services, Inc.* and bearing Case No. 2:22-cv-01352-CDS-EJY (the "Bankruptcy  
7 Cases") pending before the United States District Court for the District of Nevada. By the  
8 Dismissal Motion, the Receiver, in his capacity as the receiver for J & J Consulting Services, Inc.,  
9 a Nevada corporation ("J&J Consulting (NV)") and J and J Purchasing, LLC ("J&J Purchasing,"  
10 and together, with J&J Consulting (NV), the "Debtors"), who are the debtors and debtors in  
11 possession in the Bankruptcy Cases, is requesting that the Court dismiss the Bankruptcy Cases  
12 pursuant to 11 U.S.C. § 305(a), thereby allowing the Receiver to exclusively administer the estates  
13 of the Debtors (along with the estates of other nondebtor entities and individuals) as part of the  
14 receivership arising out of the above-captioned civil action.

15 **PLEASE TAKE FURTHER NOTICE** that on November 18, 2022, the Receiver filed  
16 the *Motion for Order Remanding Action to State Court* (the "Remand Motion") in the adversary  
17 proceeding captioned as *Mark A. Murphy, et al. v. Matthew Beasley, et al.* and bearing Case  
18 No. 2:22-cv-01549-CDS-EJY (the "Murphy Action") pending before the United States District  
19 Court for the District of Nevada. By the Remand Motion, the Receiver, in his capacity as the  
20 receiver for the Debtors, who are defendants in the Murphy Action, is requesting that the Court  
21 remand the Murphy Action to the Eighth Judicial District Court of the State of Nevada pursuant to  
22 28 U.S.C. § 1452(b) in conjunction with the dismissal of the Bankruptcy Cases.

23 **PLEASE TAKE FURTHER NOTICE** that hearings on the Dismissal Motion and  
24 Remand Motion will take place on December 16, 2022, at 1:30 p.m. in Courtroom 6B of the  
25 United States District Court for the District of Nevada, located at the Lloyd D. George United  
26 States Courthouse, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101.

27 **PLEASE TAKE FURTHER NOTICE** that you may obtain a copy of the Dismissal  
28 Motion, the Remand Motion, and the supporting papers via the United States Courts' PACER

1 (Public Access to Court Electronic Records) system (account required) at  
2 <https://pacer.uscourts.gov/> or by sending a request, by email, to the undersigned.

3  
4 Dated: November 18, 2022

SEMENZA KIRCHER RICKARD

5  
6 */s/ Jarrod L. Rickard*

Jarrod L. Rickard, Bar No. 10203  
Katie L. Cannata, Bar No. 14848  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145

8  
9 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

10 David R. Zaro (admitted *pro hac vice*)  
11 Joshua A. del Castillo (admitted *pro hac vice*)  
12 Matthew D. Pham (admitted *pro hac vice*)  
865 South Figueroa Street, Suite 2800  
Los Angeles, California 90017-2543

13 *Attorneys for Receiver Geoff Winkler*  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I am employed by the law firm of Semenza Kircher Rickard. in Clark County. I am over the age of 18 and not a party to this action. The business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

On the 18th day of November 2022, I served the document(s), described as:

**NOTICE OF FILING OF (1) RECEIVER'S MOTION FOR ORDER DISMISSING BANKRUPTCY CASES (FILED IN CASE NO. 2:22-CV-01352-CDS-EJY) AND (2) RECEIVER'S MOTION FOR ORDER REMANDING ACTION TO STATE COURT (FILED IN CASE NO. 2:22-CV-01549-CDS-EJY)**

by serving the  original  a true copy of the above and foregoing via:

a. **CM/ECF System** to the following registered e-mail addresses:

Garrett T Ogata, court@gtogata.com

Gregory E Garman, ggarman@gtg.legal, bknotices@gtg.legal

Kevin N. Anderson, kanderson@fabianvancott.com, amontoya@fabianvancott.com, mdonohoo@fabianvancott.com, sburdash@fabianvancott.com

Lance A Maningo, lance@maningolaw.com, kelly@maningolaw.com, yasmin@maningolaw.com

Michael D. Rawlins, mrawlins@smithshapiro.com, jbidwell@smithshapiro.com

Peter S. Christiansen, pete@christiansenlaw.com, ab@christiansenlaw.com, chandi@christiansenlaw.com, hvasquez@christiansenlaw.com, jcrain@christiansenlaw.com, keely@christiansenlaw.com, kworks@christiansenlaw.com, tterry@christiansenlaw.com, wbarrett@christiansenlaw.com

T. Louis Palazzo, louis@palazzolawfirm.com, celina@palazzolawfirm.com, miriam@palazzolawfirm.com, office@palazzolawfirm.com

Jonathan D. Blum, jblum@wileypetersenlaw.com, cdugenia@wileypetersenlaw.com, cpascal@wileypetersenlaw.com

Charles La Bella, charles.labella@usdoj.gov, maria.nunez-simental@usdoj.gov

Samuel A Schwartz, saschwartz@nvfirm.com, ecf@nvfirm.com

Trevor Waite, twaite@fabianvancott.com, amontoya@fabianvancott.com

Maria A. Gall, gallm@ballardspahr.com, LitDocket\_West@ballardspahr.com, crawforda@ballardspahr.com, lvdocket@ballardspahr.com

1 Keely Ann Perdue, keely@christiansenlaw.com, lit@christiansenlaw.com  
2  
3 Casey R. Fronk, FronkC@sec.gov, #slro-docket@sec.gov  
4 Tracy S. Combs, combst@sec.gov, #slro-docket@sec.gov  
5 Joseph G. Went, jgwent@hollandhart.com, Intaketeam@hollandhart.com,  
6 blschroeder@hollandhart.com  
7 Joni Ostler, ostlerj@sec.gov  
8 Daniel D. Hill, ddh@scmlaw.com

9  b. **BY U.S. MAIL.** I deposited such envelope in the mail at Las Vegas, Nevada. The  
10 envelope(s) were mailed with postage thereon fully prepaid. I am readily familiar with  
11 Semenza Kircher Rickard's practice of collection and processing correspondence for  
12 mailing. Under that practice, documents are deposited with the U.S. Postal Service on the  
13 same day which is stated in the proof of service, with postage fully prepaid at Las Vegas,  
Nevada in the ordinary course of business. I am aware that on motion of party served,  
service is presumed invalid if the postal cancellation date or postage meter date is more than  
one day after the date stated in this proof of service.

14  c. **BY PERSONAL SERVICE.**

15  d. **BY DIRECT EMAIL.**

16  e. **BY FACSIMILE TRANSMISSION.**

17  
18 I declare under penalty of perjury that the foregoing is true and correct.

19  
20 /s/ Olivia A. Kelly

An Employee of Semenza Kircher Rickard