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14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE DISTRICT OF NEVADA**

16 SECURITIES AND EXCHANGE  
COMMISSION,  
17  
18 Plaintiff,  
19 vs.  
20 MATTHEW WADE BEASLEY; et al.,  
Defendants,  
21 THE JUDD IRREVOCABLE TRUST, et al.,  
22 Relief Defendants.  
23

CASE NO. 2:22-cv-00612-CDS-EJY

**NOTICE OF NON-OPPOSITION TO  
RECEIVER’S OMNIBUS MOTION  
TO APPROVE FIFTEENTH  
QUARTERLY APPLICATIONS FOR  
FEES AND REIMBURSEMENT OF  
EXPENSES OF RECEIVER AND  
RECEIVER’S PROFESSIONALS FOR  
THE PERIOD OCTOBER 1, 2025,  
THROUGH DECEMBER 31, 2025**

24 Geoff Winkler, the Court-appointed Receiver (“Receiver”), by and through his counsel of  
25 record, the law firm of Greenberg Traurig, LLP, hereby submits the following Notice of Non-  
26 Opposition to the Receiver’s Omnibus Motion to Approve Fifteenth Quarterly Applications for Fees  
27 and Reimbursement of Expenses of Receiver and Receiver’s Professionals for the Period October 1,  
28 2025, Through December 31, 2025 (ECF No. 875) (the “Omnibus Motion”).

1 The Omnibus Motion was filed on February 18, 2026, in relation to the Fifteenth Quarterly  
2 Application for Payment of Fees and Reimbursement of Expenses of Receiver’s Counsel: 1) Allen  
3 Matkins Leck Gamble Mallory & Natsis, LLP; and 2) Semenza Rickard Law (ECF No. 871) and  
4 Declarations of Joshua del Castillo and Jarrod Rickard in support thereto (ECF Nos. 872 and 873,  
5 respectively), and Receiver’s Fifteenth Quarterly Application for Payment of Fees and  
6 Reimbursement of Expenses of Receiver and Receiver’s Professionals Greenberg Traurig, LLP, and  
7 Aitheras, LLC, for the Period October 1, 2025, through December 31, 2025 (ECF No. 874) (together,  
8 “Fee Applications”). Any response in opposition to the Omnibus Motion, was due by March 4, 2026,  
9 pursuant to Local Rule 7- 2(b). No party has timely filed a response in opposition to the Omnibus  
10 Motion, and the deadline to do so has passed.

11 In light of the forgoing and in consideration of the substantive points and legal authorities  
12 more fully set forth in the Fee Applications and Omnibus Motion, the Receiver respectfully requests  
13 the same be granted. A proposed order regarding the same is attached to ECF No. 875.

14 Respectfully submitted this 9<sup>th</sup> day of March 2026.

15 **GREENBERG TRAUIG, LLP**

16 By: */s/ Kara B. Hendricks*

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**CERTIFICATE OF SERVICE**

I hereby certify that on **March 9, 2026**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi  
An employee of GREENBERG TRAURIG, LLP

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