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9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 SECURITIES AND EXCHANGE
COMMISSION,

11
12 Plaintiff,

13 vs.

14 MATTHEW WADE BEASLEY *et al.*

15 Defendants.

16 THE JUDD IRREVOCABLE TRUST *et al.*

17 Relief Defendants.

2:22-CV-00612-CDS-EJY

**Joint Unopposed Motion to Extend Time
for the Government’s Response to the
Motion for Turnover of Receivership
Property Held by the United States
Marshals Service or Other Federal Agency
as a Result of Warrants Issued Regarding
Defendants, ECF No. 319
(First Request)**

18 This Motion to Extend Time is the first request. LR IA 6-1.

19 The government moves this Court for an Order extending the time for the
20 government to file its Response to the Motion for Turnover of Receivership Property Held
21 by the United States Marshals Service or Other Federal Agency as a Result of Warrants
22 Issued Regarding Defendants, ECF No. 319. The current deadline is October 13, 2022. The
23 government requests an extension until November 10, 2022.

24 When I received the SEC motion from the FBI, I contacted the attorneys
25 representing Christopher Humphries and the attorney representing Jessica Humphries about
26 the government dismissing its interest in the civil forfeiture of the properties the FBI seized
27 in Henderson, Nevada, and Huntington Beach, California. On Monday, their counsel
28 agreed to the dismissal based on specific terms only the SEC Receiver and SEC attorneys

1 can accept or reject. Kara B. Hendricks, counsel for the SEC Receiver, and I agreed to the
2 extension of time to provide Ms. Hendricks time to determine whether the SEC Receiver
3 and the SEC attorneys would approve the Humphries's offer with the conditions they
4 requested.

5 I also contacted John Sellers, one of the attorneys representing Judd. Mr. Sellers
6 stated he was the contact attorney for this issue. He would have to contact the other
7 attorneys to determine their positions and Judd's position. Mr. Sellers told me he had a
8 mixed review on the proposal of dismissing its interest in the civil forfeiture of the properties
9 the FBI seized. We discussed the options, and he told me he would contact me with a
10 decision. I have not heard from him since.

11 On October 12, 2022, Kara Hendricks and I agreed to the extension of time.

12 For these reasons, the government requests the extension of time until November 10,
13 2022, for the parties to come to an agreement and seek the approval of the SEC regarding
14 the disposition of the funds seized.

15 This Motion is not submitted solely for the purpose of delay or for any other
16 improper purpose.

17 This Court should grant an extension of time to, and including, November 10, 2022.

18 DATED: October 12, 2022.

19 JASON M. FRIERSON
20 United States Attorney

21 /s/ Daniel D. Hollingsworth
22 DANIEL D. HOLLINGSWORTH
23 Assistant United States Attorney

24 IT IS SO ORDERED:

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26 _____
27 CRISTINA D. SILVA
28 UNITED STATES DISTRICT JUDGE

DATED: October 14, 2022