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8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 vs.

15 MATTHEW WADE BEASLEY *et al.*

16 Defendants;

17 THE JUDD IRREVOCABLE TRUST *et al.*

18 Relief Defendants.

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

**MEMORANDUM OF FEES AND COSTS
RELATING TO MOTION TO COMPEL
OR ALTERNATIVE MOTION TO
SHOW CAUSE WHY KAMILLE DEAN
SHOULD NOT BE HELD IN
CONTEMPT FOR FAILURE TO
COMPLY WITH THIS COURT'S
ORDER**

19
20 Comes now, Geoff Winkler, the Court-appointed Receiver (the "Receiver"), by and
21 through his counsel of record the law firm of Greenberg Traurig, LLP ("Greenberg Traurig" or
22 "GT"), and hereby submits this Memorandum of Fees and Costs Relating to Motion to Compel or
23 Alternative Motion to Show Cause Why Kamille Dean Should Not be Held in Contempt for Failure
24 to Comply With This Court's Order as requested in the November 17, 2022 Order granting the
25 underlying Motion filed by the Receiver (ECF No. 368) (the "Memorandum of Fees").

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28 ///

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1 This Memorandum of Fees is based on the below Points and Authorities, the declaration
2 attached hereto, the pleadings and papers on file herein, and such other and further information as
3 may be presented to the Court at the time of any hearing.

4 DATED this 1st day of December, 2022.

GREENBERG TRAUIG, LLP

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

KARA B. HENDRICKS, Bar No. 07743

JASON K. HICKS, Bar No. 13149

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Attorneys for Receiver Geoff Winkler

11
12 **MEMORANDUM OF POINTS AND AUTHORITIES**

13 **I. INTRODUCTION.**

14 Shortly after his appointment, the Receiver became aware that Kamille Dean, of the law
15 firm Kamille Dean, P.C. was in possession of \$250,000.00 which was received from Defendant
16 Jeffrey Judd. The Receiver contacted Ms. Dean seeking turn over of the funds in accordance with
17 this Court’s directive in the Temporary Restraining Order and Asset Freeze (ECF No. 3), which
18 was later affirmed via the entry of a Preliminary Injunction. ECF No. 56. While Ms. Dean initially
19 turned over a fraction of the funds she held, Ms. Dean refused to turn over the remaining
20 \$201,060.00. After Ms. Dean’s numerous delays, the Receiver was forced to move this Court to
21 compel Ms. Dean’s compliance with the controlling orders of this case.¹ In response, Ms. Dean
22 filed four (4) separate documents seeking to exempt herself from the reach of this Court’s orders.²
23 However, on November 17, 2022, this Court entered an order granting the Receiver’s Motion to
24 Compel and denying each of Ms. Dean’s four motions in response.³ In so doing, this Court
25 awarded the Receiver his fees and costs incurring in bringing and succeeding on the Motion to
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27 ¹ See ECF No. 210.

28 ² See ECF Nos, 257, 258, 259 and 260.

³ See ECF No. 368.

1 Compel. As such, the instant Memorandum of Fees demonstrates the fees and costs incurred by
2 the Receiver with respect to this matter and establishes the propriety of the Receiver’s request.

3 **II. ARGUMENT**

4 On November 17, 2022, this Court entered an order granting the Receiver’s Motion to
5 Compel through which this Court awarded the Receiver his fees and costs incurred in bringing the
6 Motion to Compel. ECF No. 368. As set forth herein, the Receiver incurred \$36,032.25 in
7 bringing and succeeding on the Motion to Compel and therefore requests an order directing the
8 payment of the same.⁴ The Receiver’s efforts to recover the funds held by Ms. Dean were
9 predominantly performed by Greenberg Traurig, with Allen Matkins assisting in various respects.
10 As set forth herein, the Receiver’s counsel allocated 71.8 hours toward to recovery of the funds
11 improperly withheld by Ms. Dean in this dispute.

12 **A. The Receiver Requests Fees in the Amount of \$36,032.25**

13 An award of reasonable attorney’s fees is based on the “lodestar” calculation set forth in
14 *Hensley v. Eckerhart*, 461 U.S. 424, 433, 103 S. Ct. 1933 (1983). *Nev. Prop. I v. Kiwibank Ltd.*,
15 2020 U.S. Dist. LEXIS 172862, *6-7 (D. Nev. Sept. 21, 2020) (citing *Fischer v. SJB-P.D., Inc.*,
16 214 F.3d 1115, 1119 (9th Cir. 2000) (applying *Hensley*)). The Court “must first determine a
17 reasonable fee by multiplying ‘the number of hours reasonably expended on the litigation’ by ‘a
18 reasonable hourly rate.’” *Nev. Prop. I*, 2020 U.S. Dist. LEXIS 172862, 6-7 (quoting *Hensley*, 461
19 U.S. at 433). Next, the Court “must decide whether to adjust the lodestar calculation based on an
20 evaluation of the factors articulated in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir.
21 1975), which have not been subsumed into the lodestar calculation.” *Nev. Prop. I*, 2020 U.S.
22 Dist. LEXIS 172862, 6-7 (citing *Fischer*, 214 F.3d at 1110 (internal citations omitted). The *Kerr*
23 factors are:

- 24 (1) the time and labor required, (2) the novelty and difficulty of the questions
25 involved, (3) the skill requisite to perform the legal service properly, (4) the
26 preclusion of other employment by the attorney due to acceptance of the case,
(5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations

27 _____
28 ⁴ The fees sought herein relate to the work performed by the law firms of Greenberg Traurig and Allen
Matkins in this matter and do not include fees associated with the time that the Receiver spent in additional
attempt so confer with Ms. Dean prior to the filing of the underlying Motion to Compel.

1 imposed by the client or the circumstances, (8) the amount involved and the results
 2 obtained, (9) the experience, reputation, and ability of the attorneys, (10) the
 3 “undesirability” of the case, (11) the nature and length of the professional
 relationship with the client, and (12) awards in similar cases.

4 *Kerr*, 526 F.2d at 70.

5 “Once calculated, the lodestar is presumptively reasonable.” *Nev. Prop. 1*, 2020 U.S. Dist.
 6 LEXIS 172862, *6-7 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*,
 7 483 U.S. 711, 728, 107 S. Ct. 3078 (1987)). “Only in ‘rare and exceptional cases’ should a court
 8 adjust the lodestar figure.” *Id.* (quoting *Van Gerwen v. Guar. Mut. Life Co.*, 214 F.3d 1041, 1045
 9 (9th Cir. 2000) (internal citations omitted) and citing *Fischer*, 214 F.3d at 1119 n. 4 (stating that
 10 the lodestar figure should be adjusted only in rare and exceptional cases)).

11 In this case, the Receiver has employed three (3) firms to assist him in fulfilling his
 12 obligations under the Appointment Order.⁵ As it relates to the recovery of the Receivership funds
 13 held by Ms. Dean, Greenberg Traurig and Allen Matkins worked to resolve this dispute without
 14 judicial intervention and when such a resolution was no longer feasible, Greenberg Traurig and
 15 Allen Matkins collaborated in evaluating, researching, and drafting the Motion to Compel and
 16 related documents.⁶ In total, the Receiver has incurred \$30,105.25 in reasonable and necessary
 17 fees and costs in seeking Ms. Dean’s cooperation with this Court’s order inclusive of efforts to
 18 resolve the dispute without judicial intervention.⁷ The Receiver also incurred an additional
 19 \$5,927.00 in fees preparing the instant Memorandum of Fees.⁸ *See Clark v. City of L.A.*, 803 F.2d
 20 987, 992 (9th Cir 1986) (holding that fees incurred for work on fee petitions are compensable);
 21 *Camacho v. Bridgeport Fin., Inc.*, 523 F.3d 973, 981 (9th Cir. 2008) (finding “it would be
 22 inconsistent to dilute a fees award by refusing to compensate attorneys for the time they reasonably
 23 spent in establishing their rightful claim to the fee.”). Thus, a total award of \$36,032.25 in
 24 attorneys’ fees is reasonable upon consideration of the following factors.

25 _____
 26 ⁵ *See* ECF Nos. 90, 108.

27 ⁶ **Exhibit 1**, Declaration of Kara B. Hendricks (the “Hendricks Decl.”) at ¶ 19; **Exhibit 2**, Declaration of
 Joshua A. del Castillo (the “del Castillo Decl.”) at ¶ 5.

28 ⁷ **Exh. 1**, Hendricks Decl. at ¶ 20; *see also* **Exh. 2**, del Castillo Decl. at ¶ 6.

⁸ **Exh. 1**, Hendricks Decl. at ¶ 21.

1 **a. *The Time and Labor Required***

2 Inclusive of the Receiver's efforts to recover the funds held by Ms. Dean prior to filing the
3 Motion to Compel, counsel for the Receiver spent 71.8 hours working to recover the funds at
4 issue.⁹ The time spent included, among other things, the preparation of correspondence to
5 Ms. Dean requesting turnover of the funds held in trust; prolonged correspondence with Ms. Dean
6 regarding her desire to keep the funds held in trust and efforts in response thereto; preparation,
7 research, and drafting of the Motion to Compel, the Receiver's response to Ms. Dean's multiple
8 filings, and the Receiver's evaluation of Ms. Dean's response thereto.¹⁰

9 The Receiver's efforts to obtain Ms. Dean's compliance with the order of this Court began
10 shortly after his appointment in June, 2022 and continued through September, 2022.¹¹ Indeed,
11 through early communications, Ms. Dean indicated that she would file a motion with the Court
12 seeking to retain the funds in dispute.¹² However, Ms. Dean never followed through with her
13 proposed plan, forcing the Receiver to file the Motion to Compel.¹³ Rather than filing a response
14 to the Motion to Compel, Ms. Dean submitted four separate filings to which the Receiver prepared
15 an omnibus response.¹⁴ Ms. Dean's decision to submit multiple filings in response to the Motion
16 to Compel increased the amount of time spent by the Receiver on this matter substantially.¹⁵

17 Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably possible
18 with Associate Christian Spaulding accounting for 49% of the 57.2 total hours worked.¹⁶
19 Greenberg Traurig took care not to overstaff this matter.¹⁷ Mr. Spaulding did the majority of the
20 research and drafting associated with the Motion to Compel and the Receiver's response to
21

22 _____
23 ⁹ **Exh. 1**, Hendricks Decl. at ¶ 22; *see also Exh. 2*, del Castillo Decl. at ¶ 7.

24 ¹⁰ **Exh. 1**, Hendricks Decl. at ¶ 23; *see also Exh. 2*, del Castillo Decl. at ¶ 8.

25 ¹¹ **Exh. 1**, Hendricks Decl. at ¶ 24.

26 ¹² *Id.* at ¶ 25.

27 ¹³ *Id.* at ¶ 26.

28 ¹⁴ *Id.* at ¶ 27.

¹⁵ *Id.* at ¶ 28.

¹⁶ **Exh. 1**, Hendricks Decl. at ¶ 29.

¹⁷ *Id.* at ¶ 30.

1 Ms. Dean's filings.¹⁸ Kara Hendricks managed the majority of the communications with third-
 2 parties, including Ms. Dean and contributed significantly to the drafting of the Receiver's Motion
 3 to Compel and Omnibus Response to Ms. Dean's Motions.¹⁹ The remainder of the hours spent
 4 are attributed to Shareholder Jason Hicks, accounting for just 2 hours, and paralegal Cynthia Ney,
 5 accounting for just 1.7 hours.²⁰ Mr. Hicks and Ms. Ney assisted Mrs. Hendricks and Mr. Spaulding
 6 in strategizing and completing the filings in this matter.²¹ As can be seen from the billing entries
 7 on this matter, Greenberg Traurig took care to ensure an efficient use of resources and that efforts
 8 were not duplicated.²² Given the foregoing and in light of the circumstances giving rise to this
 9 matter, the 57.2 hours spent by Greenberg Traurig were reasonable and appropriate.²³

10 Additionally, Allen Matkins endeavored to resolve this matter as efficiently as possible.²⁴
 11 In so doing, Joshua del Castillo and David Zaro allocated 14.6 hours to this matter, inclusive of
 12 their efforts prior to the filing of the Motion to Compel.²⁵ As demonstrated through the attached
 13 billing entries, Allen Matkins efficiently staffed and expended a reasonable amount of hours to
 14 this matter.²⁶

15 **b. *The Novelty and Difficulty of the Questions Involved***

16 In general, proceedings in an equitable receivership are inherently complex. *See SEC v.*
 17 *Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986) (finding the district court has broad powers and wide
 18 discretion to determine the appropriate relief in an equity receivership because most receiverships
 19 involve multiple parties and complex transactions); *see also Sec. & Exch. Com. v. W. L. Moody &*
 20 *Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 486 (S.D. Tex. 1974) ("An equitable
 21 receivership is by its very nature, a legally complex process). The matters contemplated in the

22 ¹⁸ **Exh. 1**, Hendricks Decl. at ¶ 31.

23 ¹⁹ *Id.* at ¶ 32.

24 ²⁰ *Id.* at ¶ 33.

25 ²¹ *Id.* at ¶ 34.

26 ²² *Id.* at ¶ 35.

27 ²³ **Exh. 1**, Hendricks Decl. at ¶ 36.

28 ²⁴ **Exh. 2**, del Castillo Decl. at ¶ 14.

²⁵ *Id.* at ¶ 15.

²⁶ *Id.* at ¶ 16.

1 Motion to Compel are no different. In seeking to enforce this Court’s orders, the Receiver and his
2 counsel were tasked with analyzing numerous theories, case law, statutes, and codes including, but
3 not limited to, contempt, allocation of receivership property for the payment of attorneys’ fees,
4 modifications to asset freeze orders, rules of professional conduct and personal jurisdiction. In
5 addition, prosecution of the matters at issue required an extensive analysis of the record in this
6 case, including documentation and communications from numerous parties and a determination of
7 where the funds at issue came from.

8 Given the wide range of complex legal theories addressed in the filings, this Court may
9 reasonably find the matters set forth in the Motion to Compel and Ms. Dean’s filings in response
10 were complex, novel, and difficult.

11 **c. *The Skill Requisite to Perform the Legal Service Properly***

12 In line with the preceding section, significant skill and expertise was required to perform
13 the legal services discussed herein. As above, this matter involved a wide range of complex legal
14 theories, each of which were researched, briefed, and addressed in full detail by counsel for the
15 Receiver.

16 **d. *The Preclusion of Other Employment Due to Acceptance of the Case***

17 Greenberg Traurig is a global firm of significant capacity, such that although individual
18 lawyers may have been working at capacity on this matter, the firm was not, as a whole, precluded
19 from performing other work. Likewise, Allen Matkins was not, as a whole, precluded from
20 performing other work as a result of the efforts allocated to this matter. However, given the breadth
21 of the matters at issue in this case, the substantial amount of time devoted to addressing Ms. Dean’s
22 noncompliance could have been allocated to other efforts to preserve and marshal the Receivership
23 Estate. Indeed, as of the date of this filing, the Receiver and his counsel continue to work diligently
24 to locate and take control of all receivership assets in accordance with the Appointment Order. As
25 such, the 71.8 hours allocated to obtaining Ms. Dean’s compliance with a clear court order
26 precluded the Receiver from utilizing that time to further the interests of the Receivership Estate.

27 ///

28 ///

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e. *The Customary Fee and Whether the Fee is Fixed or Contingent*

Greenberg Traurig and Allen Matkins have been approved by this Court as counsel for the Receiver. ECF Nos. 89, 219. As set forth in the Motion For Order Authorizing Receiver to Employ Counsel (ECF No. 89), both firms have agreed to a substantial reduction of their customary rates in this case. With respect to the fees sought through the instant Memorandum, Greenberg Traurig charged the rates previously approved by this Court. ECF Nos. 219, 315²⁷. Indeed, only four Greenberg Traurig employees worked on this matter, each of whom charged rates previously approved by this Court. Shareholder Kara Hendricks devoted 25.4 hours to this dispute for a total of \$12,171.37, averaging \$479.19 per hour.²⁸ Associate Christian Spaulding worked 28.1 hours, for a total of \$8,956.91, averaging \$318.75 per hour.²⁹ Shareholder Jason Hicks spent 2 hours on this matter for a total of \$722.47, averaging \$361.24 per hour.³⁰ Finally, Paralegal Cynthia Ney spent 1.7 hours on this dispute for a total of \$297.50, averaging \$175.00 per hour.³¹ As can be seen from the foregoing, Greenberg Traurig worked this matter at a significant discount from its ordinary rates.

Similarly, as demonstrated by the billing entries submitted herewith, Joshua del Castillo and David Zaro charged the rates previously approved by this Court.³²

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²⁷ ECF No. 315 – Order Approving Amended First Application of Receiver and Receiver’s Professionals for Allowance and Payment of Fees and Costs for the Period From June 3, 2022 through June 30, 2022 (the “Order Approving Receiver’s First Application for Fees”). Through the Order Approving Receiver’s First Application for Fees, this Court previously approved hourly rates for Greenberg Traurig mirroring those requested herein.

²⁸ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mrs. Hendricks hourly rate of \$480.25. ECF No. 219.

²⁹ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Spaulding’s hourly rate of \$318.75. ECF No. 219.

³⁰ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Hicks’ hourly rate of \$361.75. ECF No. 219.

³¹ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mrs. Ney’s hourly rate of \$250.75. ECF No. 219.

³² Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mr. del Castillo and Mr. Zaro’s hourly rate of \$545 per hour.

1 **f. *The Time Limitations Imposed by the Client or the Circumstances***

2 The Receiver’s efforts to collect the funds held by Ms. Dean were performed under narrow
3 time limitations, which were exacerbated by Ms. Dean’s multiple filings in response to the Motion
4 to Compel. As an initial matter, the Receiver’s efforts to collect the funds prior to filing the Motion
5 to Compel are necessarily conducted with a “time is of the essence” mentality as each additional
6 day that funds and/or assets are held by third parties affects the totality of the Receivership Estate,
7 thereby affecting the availability of recovery for the victims of the Ponzi-scheme. In other words,
8 for each day that Ms. Dean held the funds that she had received by Judd, the Receiver was deprived
9 of the ability to marshal and preserve those funds for the benefit of the victims. For this reason,
10 collection efforts, such as those directed toward Ms. Dean, are conducted under tight time
11 limitations.

12 What is more, the Receiver filed his Motion to Compel on August 1, 2022. ECF No. 210
13 After failing to respond to the Motion to Compel in a traditional manner, on August 15, 2022,
14 Ms. Dean submitted four (4) separate filings seeking to quash jurisdiction, asking that the Motion
15 to Compel be stricken, seeking leave to file an interpleader action and separately objecting to
16 declarations submitted by counsel for the Receiver in Support of the Motion to Compel. ECF
17 Nos. 257-260. As a result of the same, the Receiver filed an Omnibus Response addressing all
18 issues raised by Ms. Dean. ECF No. 275. The Receiver’s efforts in this matter were substantial
19 and performed under tight time limitations pursuant to the local rules.

20 **g. *The Experience, Reputation, and Ability of the Attorneys***

21 GT was chosen by the Receiver as Nevada counsel based on GT’s expertise and ability to
22 adequately represent the Receiver and assist in the duties and obligations under the Appointment
23 Order and the firms local contacts in Las Vegas and surrounding areas.³³ GT is AV rated by
24 Martindale Hubbell and has an excellent reputation in the legal community.³⁴ Moreover, GT has
25 extensive experience in all areas of litigation as well as in receivership matters.³⁵

26
27 ³³ **Exh, 1**, Hendricks Decl. at ¶ 6.

28 ³⁴ *Id.* at ¶ 7.

³⁵ *Id.* at ¶ 8.

1 Kara Hendricks is a shareholder in GT's Las Vegas office and has over 20 years of
 2 experience litigating matters as well as working with companies to resolve disputes outside of the
 3 litigation context.³⁶ Ms. Hendricks is experienced representing businesses in all manners of
 4 contract disputes, litigating products liability matters, handling catastrophic injury cases,
 5 defending civil rights claims, litigating employment non-compete agreements, handling derivative
 6 suits, resolving property and construction defect disputes, assessing insurance coverage issues, and
 7 has represented receivers appointed to handle matters involving insolvent insurance companies.³⁷
 8 Jason Hicks is also a shareholder in GT's Las Vegas office and has approximately nine years of
 9 litigation experience including representing businesses and individuals in civil litigation matters.³⁸
 10 His practice touches on all manners of disputes affecting businesses and professionals, and he has
 11 experience representing clients in actions involving claims of breach of contract, breach of
 12 fiduciary duty, shareholder derivative matters, fraud, misappropriation of trade secrets,
 13 employment, trademark, governmental False Claims Act suits, product defect, and general liability
 14 matters, among other areas.³⁹ Mr. Hicks' practice spans across a variety of industries, such
 15 as casino and gaming, medicine and medical devices, live entertainment, banking, construction,
 16 technology, restaurant, and media.⁴⁰

17 Christian Spaulding is an associate in GT's Las Vegas office and regularly practices in
 18 both the state and federal district courts of Nevada.⁴¹ Mr. Spaulding has been practicing since
 19 2016 and has experience handling large scale and complex litigation in state and federal court.⁴²
 20 As shareholders, Mrs. Hendricks and Mr. Hicks oversaw GT's role in this matter with
 21 Mr. Spaulding handling the bulk of the research, drafting and administrative work required.⁴³
 22

23 ³⁶ **Exh. 1**, Hendricks Decl. at ¶ 9.

24 ³⁷ *Id.* at ¶ 10.

25 ³⁸ *Id.* at ¶ 11.

26 ³⁹ *Id.* at ¶ 12.

27 ⁴⁰ *Id.* at ¶ 13.

28 ⁴¹ **Exh. 1**, Hendricks Decl. at ¶ 14.

⁴² *Id.* at ¶ 15.

⁴³ *Id.* at ¶ 16.

1 Additionally, Cynthia Ney, is an experienced paralegal in GT’s Las Vegas office and has assisted
2 in the handling of numerous matters in both state and federal courts.⁴⁴

3 Like Greenberg Traurig, Allen Matkins was chosen by the Receiver to serve as one of two
4 firms serving as general receivership counsel due to the firm’s decades-long experience and
5 expertise in federal equity receivership matters, as well as in creditors’ rights, litigation, and
6 personal and real property disposition matters.⁴⁵ Indeed, Allen Matkins has served as counsel to
7 federal equity receivers in dozens of cases, has represented a variety of constituents in hundreds
8 of bankruptcy matters, and has significant substantive experience in related areas, such as
9 securities, corporate, and real estate.⁴⁶

10 With respect to the instant matter, two Allen Matkins attorneys devoted time to this dispute,
11 Joshua del Castillo and David Zaro.⁴⁷ Mr. del Castillo is a bankruptcy and creditors’ rights
12 litigation partner at Allen Matkins, with over a decade of experience representing federal equity,
13 and state court, receivers.⁴⁸ Mr. Zaro is the head of Allen Matkins’ receiverships practice, and
14 likewise a bankruptcy and creditors’ rights litigation partner, with decades of experience
15 representing both federal and state-court receivers.⁴⁹

16 **h. *The Undesirability of the Case***

17 This matter could be considered “undesirable” only insofar as Ms. Dean’s delays and
18 litigation tactics have created unnecessary work and expenses borne by the Receiver. The Motion
19 for which this Court awarded the Receiver his attorneys’ fees is a clear demonstration of the
20 vexatious litigation tactics employed by Ms. Dean.

21 **i. *The Nature and Length of the Professional Relationship with the Client***

22 Shortly after being appointed by this Court, the Receiver retained Greenberg Traurig and
23 Allen Matkins to assist him in carrying out his duties under the Appointment Order. ECF No. 89.

24 _____
25 ⁴⁴ **Exh. 1**, Hendricks Decl. at ¶ 17.

26 ⁴⁵ **Exh. 2**, del Castillo Decl. at ¶ 3.

27 ⁴⁶ *Id.* at ¶ 4.

28 ⁴⁷ *Id.* at ¶ 5.

⁴⁸ *Id.* at ¶ 6.

⁴⁹ *Id.* at ¶ 7.

1 In the nearly six (6) months since being retained, Greenberg Traurig and Allen Matkins have
2 worked closely with the Receiver and performed a litany of services to assist the Receiver in
3 carrying out his duties.

4 **j. Awards in Similar Cases**

5 As this Court is aware, the proceedings giving rise to the instant Memorandum were
6 necessitated by Ms. Dean's failure to comply with the terms of this Court's order. After failed
7 attempts to induce compliance, the Receiver was forced to seek judicial intervention. Courts of
8 this jurisdiction have awarded fee requests in situations analogous to this, wherein a party was
9 forced to compel another's compliance with court orders or applicable rules. By way of example,
10 in *Grimsley v. Charles River Labs*, the Court granted defendants' request for attorneys' fees in
11 opposing plaintiff's motion to compel. *Grimsley v. Charles River Labs*, No. 3:08-cv-00482-LRH-
12 VPC, 2010 U.S. Dist. LEXIS 123769, at *17 (D. Nev. Nov. 2, 2010). In *Grimsley*, the plaintiff
13 failed to engage in a meaningful meet and confer despite a direct order from the court to do so.
14 Subsequently, Plaintiff filed a motion to compel discovery responses, which was denied by the
15 court. Because the plaintiff had failed to comply with the court's order to engage in meaningful
16 meet and confer efforts, the court awarded the defendant its attorney fees and costs. Similarly, in
17 *Invesco High Yield Field v. Jecklin*, the Court found that 60.9 hours at a blended rate of \$492 per
18 hour to be reasonably incurred in relation to a motion to compel.

19 With respect to the services rendered by Greenberg Traurig, the Receiver seeks
20 compensation for 57.2 hours of work at a blended rate of approximately \$387 per hour (exclusive
21 of the fees incurred in drafting the instant Memorandum). Attached to Ms. Hendricks' declaration
22 attached hereto are the itemized billing entries showing the time worked in tenths of hours.⁵⁰

23 Similarly, with respect to the services rendered by Allen Matkins, the Receiver seeks
24 compensation for 14.6 hours of work at a blended rate of approximately \$545 per hour. Attached
25 to Mr. del Castillo's declaration submitted herewith are the itemized billing entries showing the
26 time worked in tenths of hours.

27 _____
28 ⁵⁰ For the sake of brevity, only pages of the applicable invoices containing the relevant entries have been
attached. All pages which do not contain entries related to the Receiver's efforts to recover the funds at
issue from Ms. Dean have been omitted.

1 Given that this Court has issued awards exceeding this amount, in instances less egregious
2 than this, the Receiver’s requested fees are reasonable and appropriate.

3 **III. CONCLUSION**

4 For the foregoing reasons, the Receiver and Greenberg Traurig respectfully requests that
5 the Court order the payment of attorneys’ fees in the amount of \$36,032.25 which includes the
6 fees incurred in preparing the instant Memorandum.

7 DATED this 1st day of December 2022.

GREENBERG TRAUIG, LLP

8
9 By: /s/ Kara B. Hendricks

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I hereby certify that, on the 1st day of December 2022, a true and correct copy of the foregoing **MEMORANDUM OF FEES AND COSTS RELATING TO MOTION TO COMPEL OR ALTERNATIVE MOTION TO SHOW CAUSE WHY KAMILLE DEAN SHOULD NOT BE HELD IN CONTEMPT FOR FAILURE TO COMPLY WITH THIS COURT’S ORDER** was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s CM/ECF system, and parties may access this filing through the Court’s CM./ECF system.

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

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

SECURITIES & EXCHANGE COMMISSION v. MATTHEW WADE BEASLEY,
USDC CASE NO. 2:22-CV-00612-CDS-EJY

EXHIBIT	DESCRIPTION	
Exhibit 1	Declaration of Kara B. Hendricks, Esq.	
	Exhibit A	Invoices
Exhibit 2	Declaration of Joshua A. del Castillo, Esq.	
	Exhibit A	Invoices

EXHIBIT 1

EXHIBIT 1

Declaration of Kara B. Hendricks, Esq.

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 JASON K. HICKS, Bar No. 13149
hicksja@glaw.com
3 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
4 **GREENBERG TRAUIG, LLP**
10845 Griffith Peak Drive, Suite 600
5 Las Vegas, Nevada 89135
Telephone: (702) 792-3773
6 Facsimile: (702) 792-9002

7 *Attorneys for Geoff Winkler Receiver*

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

10 SECURITIES AND EXCHANGE
11 COMMISSION,

12 Plaintiff,

13 vs.

14 MATTHEW WADE BEASLEY *et al.*

15 Defendants;

16 THE JUDD IRREVOCABLE TRUST *et al.*

17 Relief Defendants.

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

**DECLARATION OF KARA B.
HENDRICKS IN SUPPORT
MEMORANDUM OF FEES AND
COSTS RELATING TO MOTION TO
COMPEL OR ALTERNATIVE
MOTION TO SHOW CAUSE WHY
KAMILLE DEAN SHOULD NOT BE
HELD IN CONTEMPT FOR FAILURE
TO COMPLY WITH THIS COURT'S
ORDER**

18
19 I, KARA B. HENDRICKS, ESQ., declare as follows:

20 1. I am over 21 years old and I am a shareholder at Greenberg Traurig LLP, based in
21 its Las Vegas, Nevada office. I am a licensed Nevada attorney.

22 2. By virtue of my position with Greenberg Traurig, I am competent to testify to the
23 matters presented in this declaration, and I submit this declaration in support of the Receiver's
24 Memorandum of Fees and Costs Relating to Motion to Compel or Alternative Motion to Show
25 Cause Why Kamille Dean Should Not be Held in Contempt for Failure to Comply With This
26 Court's Order.

27 3. This declaration is based on my personal knowledge, except where made on
28 information and belief, and as to those matters, I believe them to be true.

Greenberg Traurig, LLP
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Las Vegas, NV 89135
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- 1 4. Greenberg Traurig was retained by the Receiver in June 2022.
- 2 5. The Receiver selected Greenberg Traurig as one of two firms serving as general
- 3 receivership counsel due to the firm's litigation experience, receivership experience, and strong
- 4 Nevada base.
- 5 6. GT was chosen by the Receiver as Nevada counsel based on GT's expertise and
- 6 ability to adequately represent the Receiver and assist in the duties and obligations under the
- 7 Appointment Order and the firms local contacts in Las Vegas and surrounding areas.
- 8 7. GT is AV rated by Martindale Hubbell and has an excellent reputation in the legal
- 9 community.
- 10 8. Moreover, GT has extensive experience in all areas of litigation as well as in
- 11 receivership matters.
- 12 9. I am a shareholder in GT's Las Vegas office and have over 20 years of experience
- 13 litigating matters as well as working with companies to resolve disputes outside of the litigation
- 14 context.
- 15 10. I am experienced representing businesses in all manners of contract disputes,
- 16 litigating products liability matters, handling catastrophic injury cases, defending civil rights
- 17 claims, litigating employment non-compete agreements, handling derivative suits, resolving
- 18 property and construction defect disputes, assessing insurance coverage issues, and has represented
- 19 receivers appointed to handle matters involving insolvent insurance companies.
- 20 11. Jason Hicks is also a shareholder in GT's Las Vegas office and has approximately
- 21 nine years of litigation experience including representing businesses and individuals in civil
- 22 litigation matters.
- 23 12. His practice touches on all manners of disputes affecting businesses and
- 24 professionals, and he has experience representing clients in actions involving claims of breach of
- 25 contract, breach of fiduciary duty, shareholder derivative matters, fraud, misappropriation of trade
- 26 secrets, employment, trademark, governmental False Claims Act suits, product defect, and general
- 27 liability matters, among other areas.
- 28 ///

1 13. Mr. Hicks’ practice spans across a variety of industries, such as casino and
2 gaming, medicine and medical devices, live entertainment, banking, construction, technology,
3 restaurant, and media.

4 14. Christian Spaulding is an associate in GT’s Las Vegas office and regularly practices
5 in both the state and federal district courts of Nevada.

6 15. Mr. Spaulding has been practicing since 2016 and has experience handling large
7 scale and complex litigation in state and federal court.

8 16. As shareholders, Mr. Hicks and I oversaw GT’s role in this matter with Mr.
9 Spaulding handling the bulk of the research, drafting and administrative work required.

10 17. Additionally, Cynthia Ney, is an experienced paralegal in GT’s Las Vegas office
11 and has assisted in the handling of numerous matters in both state and federal courts

12 18. On November 17, 2022, this Court entered an order granting the Receiver’s Motion
13 to Compel through which this Court awarded the Receiver his fees and costs incurred in bringing
14 the Motion to Compel.

15 19. Greenberg Traurig worked to resolve this dispute without judicial intervention and
16 when such a resolution was no longer feasible, Greenberg Traurig and Allen Matkins collaborated
17 in evaluating, researching, and drafting the Motion to Compel and related documents.

18 20. In total, Greenberg Traurig incurred \$22,148.25 in reasonable and necessary fees
19 and costs in seeking Ms. Dean’s cooperation with this Court’s order inclusive of efforts to resolve
20 the dispute without judicial intervention.

21 21. Greenberg Traurig also incurred an additional \$5,927.00 in fees preparing the
22 instant Memorandum of Fees.

23 22. Inclusive of the Receiver’s efforts to recover the funds held by Ms. Dean prior to
24 filing the Motion to Compel, Greenberg Traurig spent 57.2 hours working to recover the funds at
25 issue.

26 23. The time spent included, among other things, the preparation of correspondence to
27 Ms. Dean requesting turnover of the funds held in trust; prolonged correspondence with Ms. Dean
28 regarding her desire to keep the funds held in trust and efforts in response thereto; preparation,

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1 research, and drafting of the Motion to Compel, the Receiver’s response to Ms. Dean’s multiple
2 filings, and the Receiver’s evaluation of Ms. Dean’s response thereto.

3 24. The Receiver’s efforts to obtain Ms. Dean’s compliance with the order of this Court
4 began shortly after his appointment in June, 2022 and continued through September, 2022.

5 25. Indeed, through early communications, Ms. Dean indicated that she would file a
6 motion with the Court seeking to retain the funds in dispute.

7 26. However, Ms. Dean never followed through with her proposed plan, forcing the
8 Receiver to file the Motion to Compel.

9 27. Rather than filing a response to the Motion to Compel, Ms. Dean submitted four
10 separate filings to which the Receiver prepared an omnibus response.

11 28. Ms. Dean’s decision to submit multiple filings in response to the Motion to Compel
12 increased the amount of time spent by the Receiver on this matter substantially.

13 29. Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably
14 possible with Associate Christian Spaulding accounting for 49% of the 57.2 total hours worked.

15 30. Greenberg Traurig took care not to overstaff this matter.

16 31. Mr. Spaulding did the majority of the research and drafting associated with the
17 Motion to Compel and the Receiver’s response to Ms. Dean’s filings.

18 32. I managed the majority of the communications with third-parties, including Ms.
19 Dean and contributed significantly to the drafting of the Receiver’s Motion to Compel and
20 Omnibus Response to Ms. Dean’s Motions.

21 33. The remainder of the hours spent are attributed to Shareholder Jason Hicks,
22 accounting for just 2 hours, and paralegal Cynthia Ney, accounting for just 1.7 hours.

23 34. Mr. Hicks and Ms. Ney assisted Mr. Spaulding and myself in strategizing and
24 completing the filings in this matter.

25 35. As can be seen from the billing entries on this matter, Greenberg Traurig took care
26 to ensure an efficient use of resources and that efforts were not duplicated.

27 36. Given the foregoing and in light of the circumstances giving rise to this matter, the
28 57.2 hours spent by Greenberg Traurig were reasonable and appropriate.

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37. Attached to this declaration as Exhibit A are true and correct copies of the invoice entries related to the Receiver’s efforts to recover the funds at issue from Ms. Dean.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct

Executed on December 1, 2022.

/s/ Kara B. Hendricks

KARA B. HENDRICKS, ESQ.

Declarant

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
(702) 792-3773
(702) 792-9002 (fax)

EXHIBIT A

EXHIBIT A

Billing Entries related to Greenberg Traurig, LLP

GreenbergTraurig

Invoice No.: 1000096060
File No. : 209375.010100
Bill Date : October 3, 2022

Geoff Winkler
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES INVOICE 1000055815

Total Fees: \$ 60,998.18

Expenses:

Parking Charges 4.00

Total Expenses: \$ 4.00

Current Invoice: \$ 61,002.18

Previous Balance (see attached statement): \$ 104,015.86

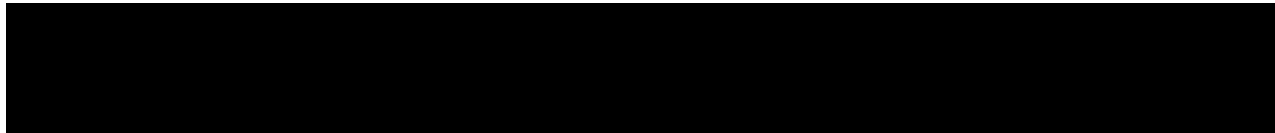





Total Amount Due: \$ 165,018.04

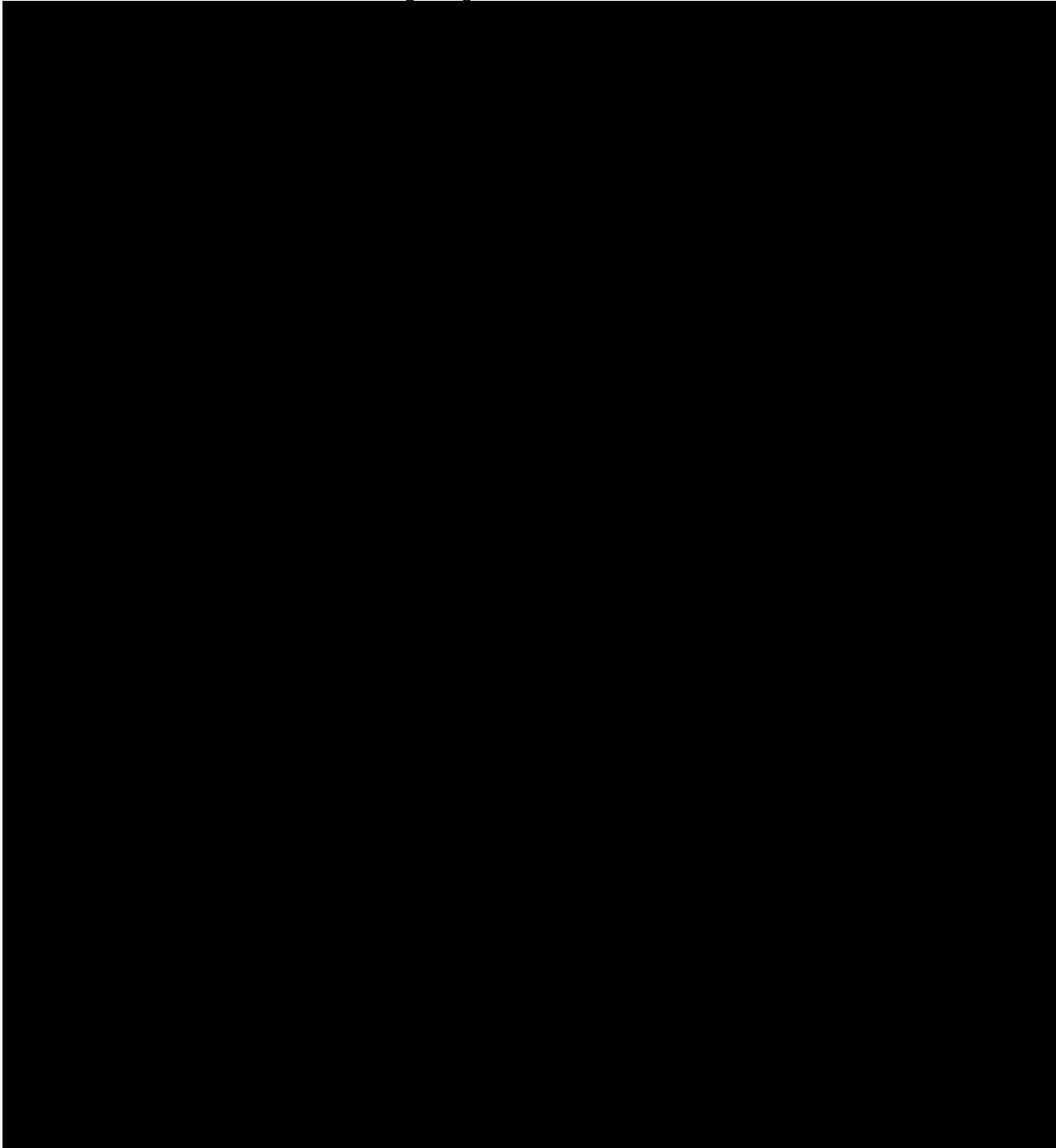
KBH:LC
Tax ID: 13-3613083

Invoice No.: 1000096060
Matter No.: 209375.010100

Page 2

Description of Professional Services Rendered

				
07/06/22	Kara B. Hendricks	Correspond with D. Zaro re: K. Dean.	0.10	48.02
				
07/06/22	Kara B. Hendricks	Prepare correspondence to Oberheiden PC, M. Peters, K. Dean, and J. Sellers regarding funds held in trust.	1.60	768.40

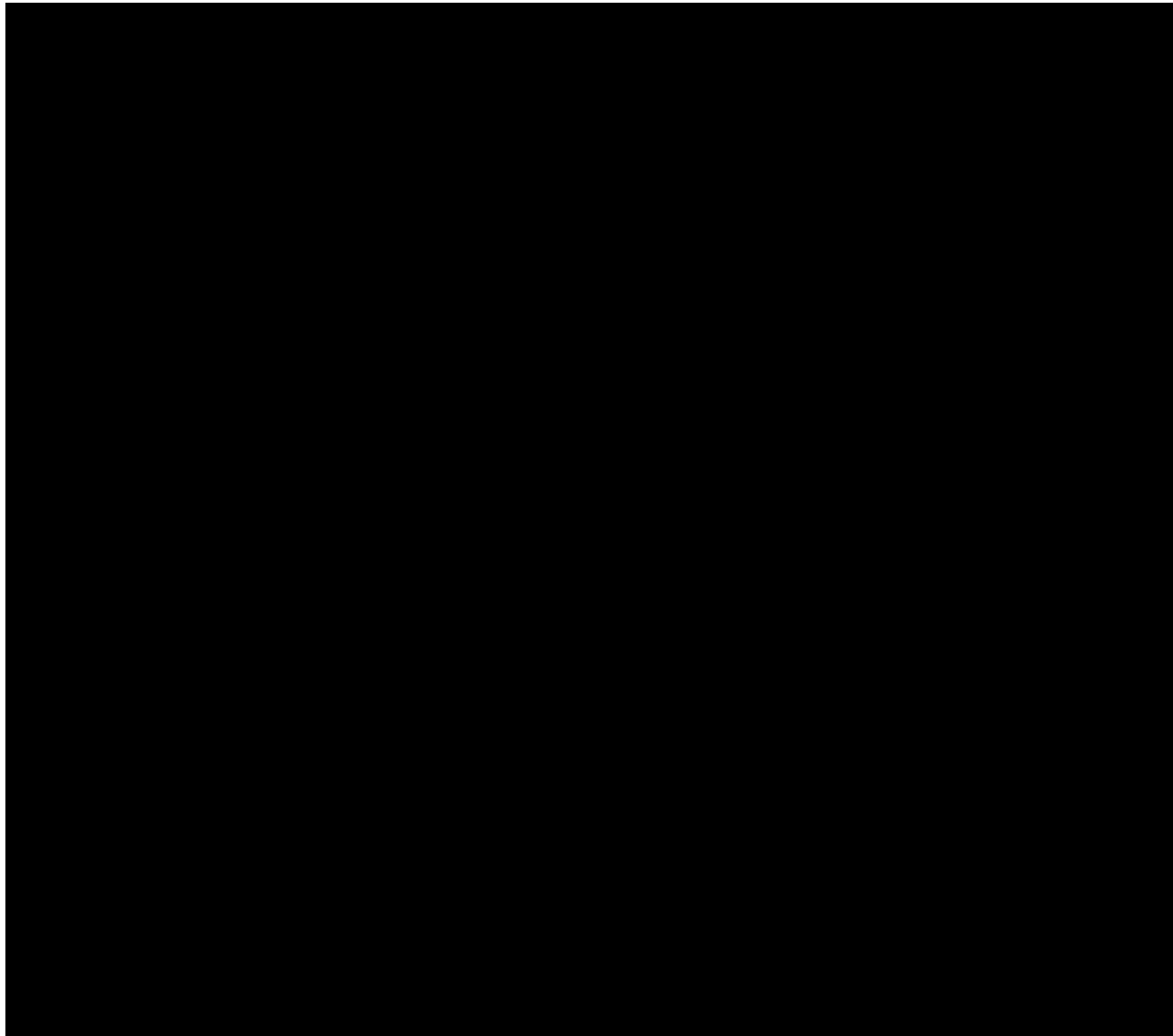


Invoice No.: 1000096060
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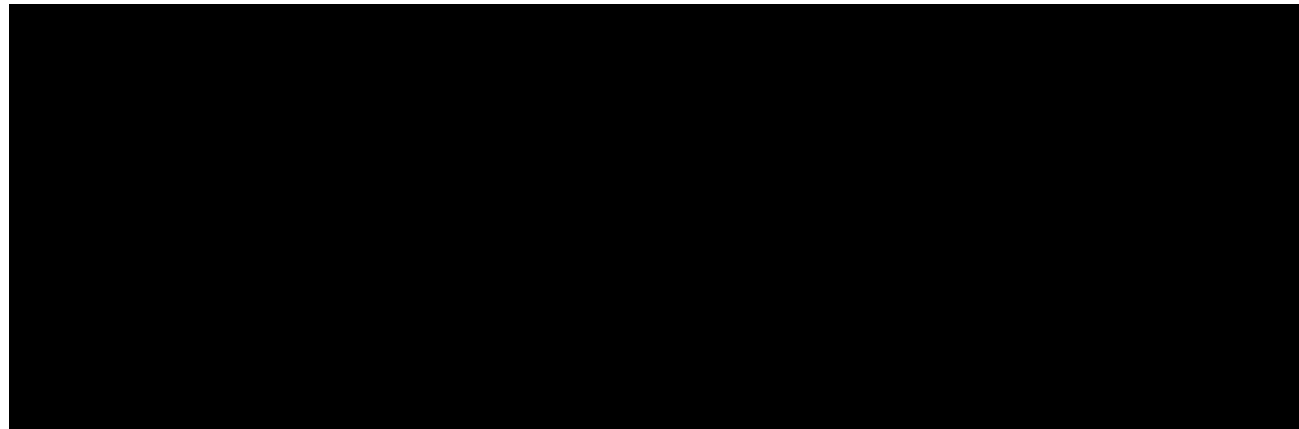
Page 3

Description of Professional Services Rendered

07/07/22	Kara B. Hendricks	Correspond with D. Zaro re: K. Dean.	0.20	96.05
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07/08/22	Kara B. Hendricks	Review correspondence and stipulation from K. Dean and follow-up with team regarding referenced acknowledgment.	0.50	240.12
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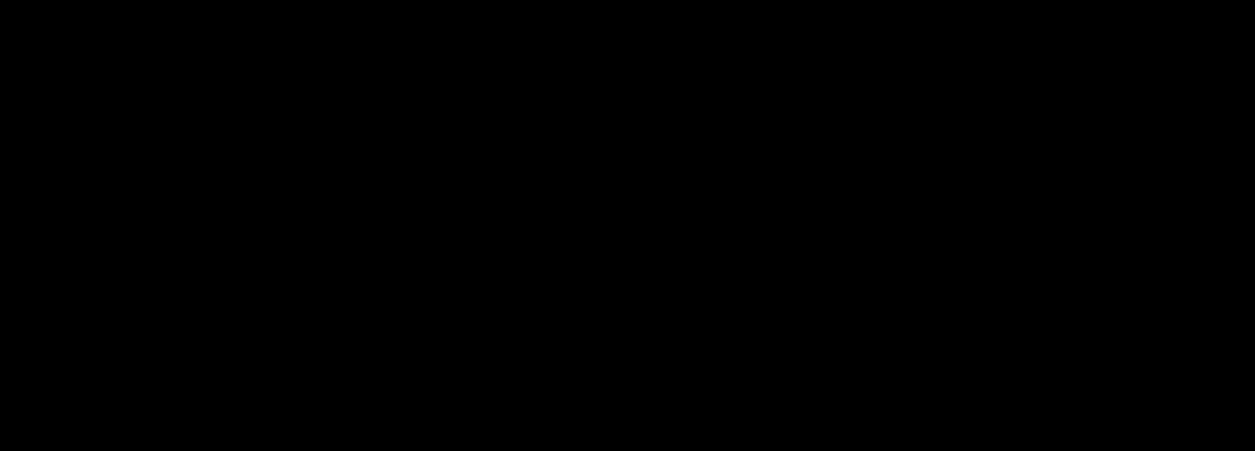


Invoice No.: 1000096060
Matter No.: 209375.010100

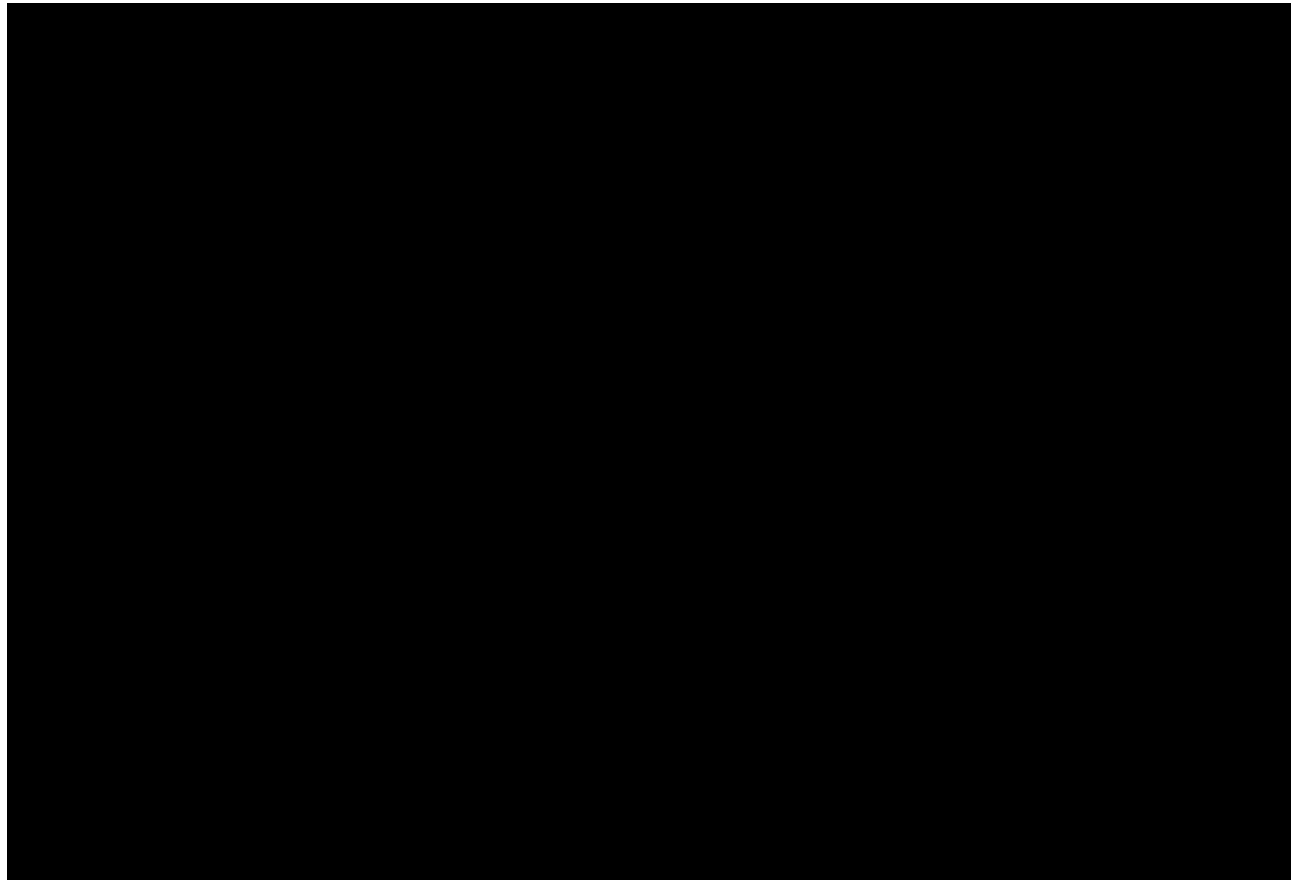
Page 4

Description of Professional Services Rendered

		  		
07/08/22	Jason Hicks	Review correspondence and proposed stipulation from Kamille Dean re: her desire to keep funds paid to her by Judd defendants.	0.20	72.25



07/11/22	Kara B. Hendricks	Review new information from D. Zaro regarding communication with K. Dean and prepare detailed email clarifying issues regarding return of funds and providing deadlines.	0.50	240.12
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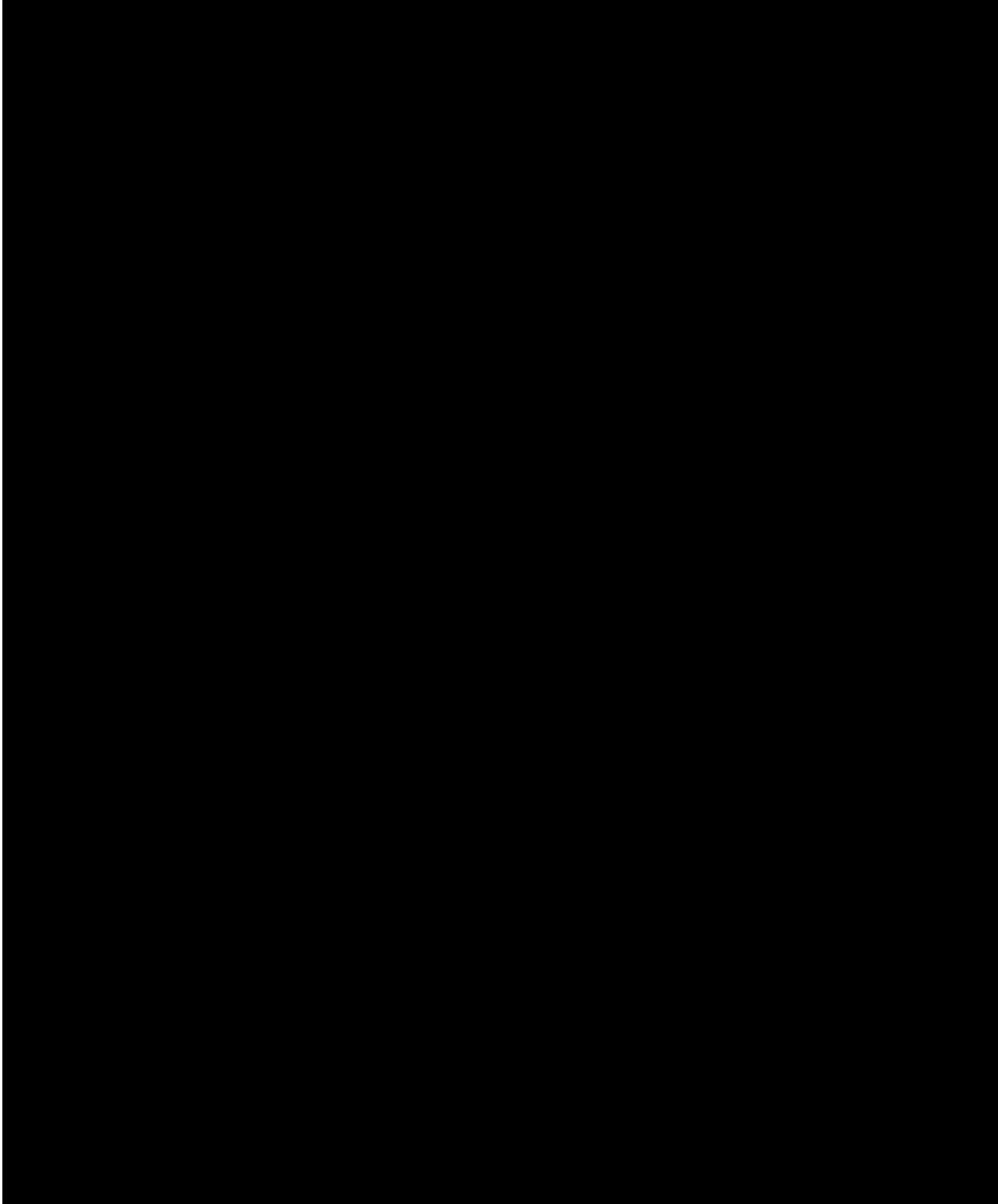


Invoice No.: 1000096060
Matter No.: 209375.010100

Page 5

Description of Professional Services Rendered

07/11/22	Jason Hicks	[REDACTED] [REDACTED].	0.20	72.25
Strategize regarding Kamille Dean (Judd) refusal to turnover all funds.				



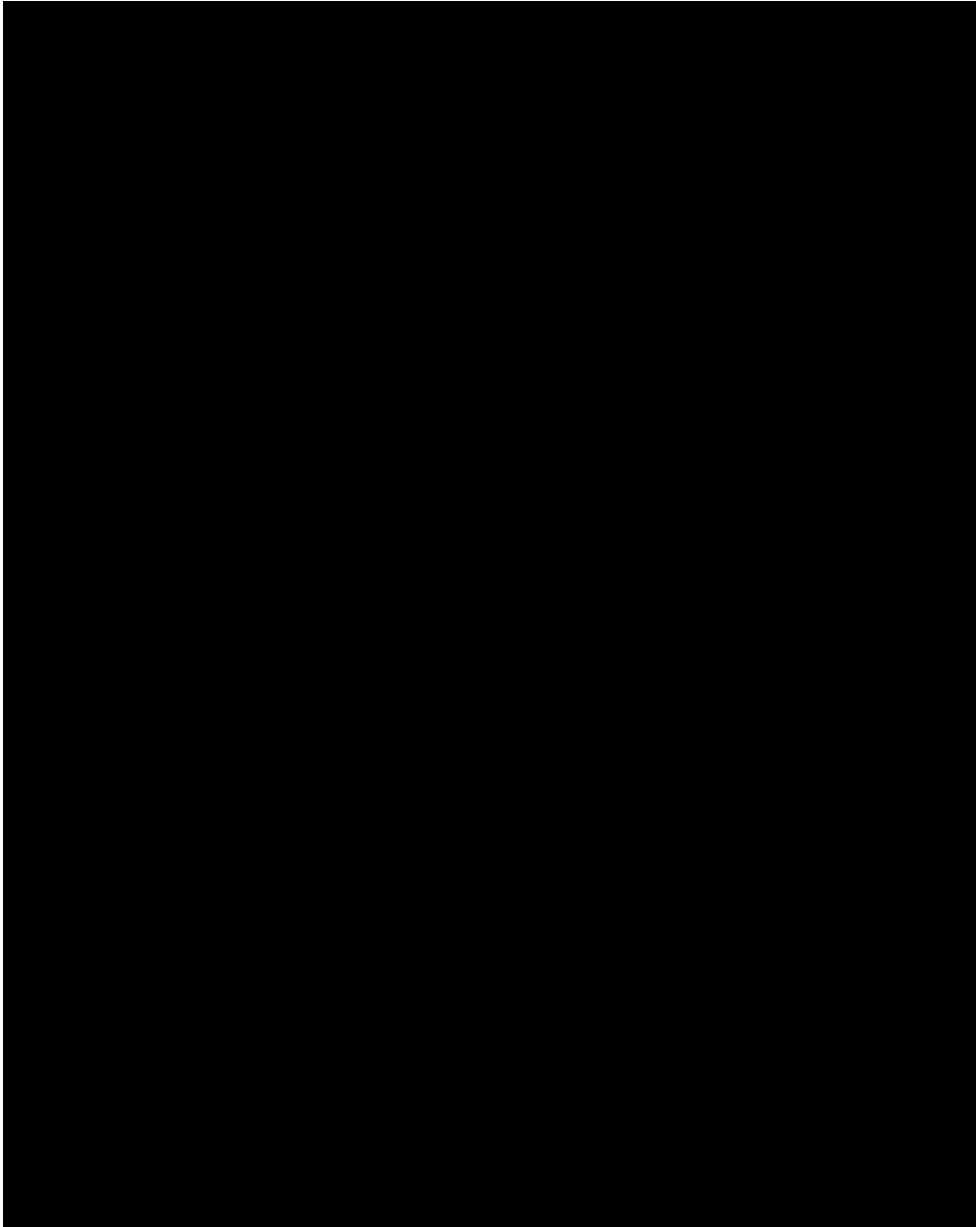
07/13/22	Kara B. Hendricks	Correspond with K. Dean on monies	0.20	96.05
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Matter No.: 209375.010100

Page 6

Description of Professional Services Rendered

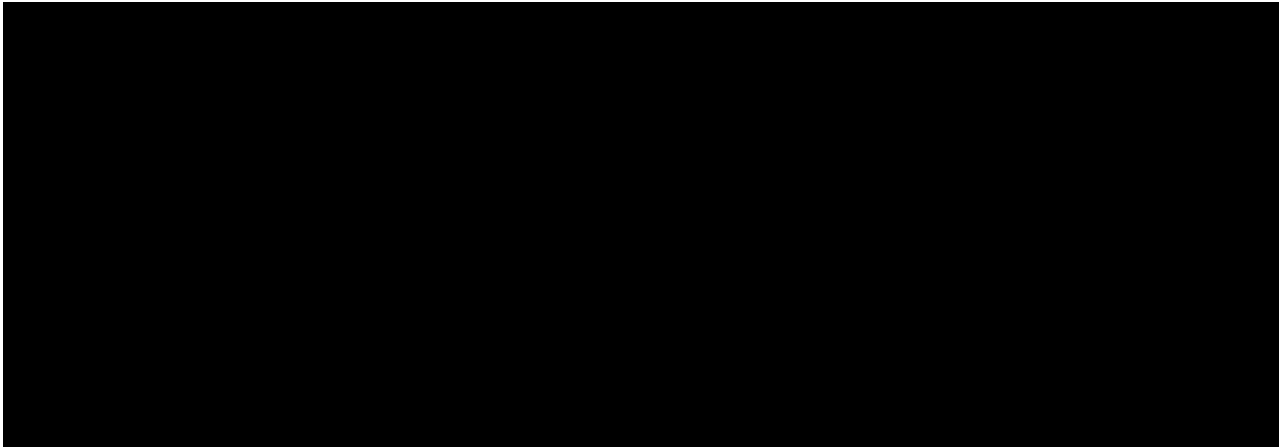
withheld and expected motion to retain
funds.



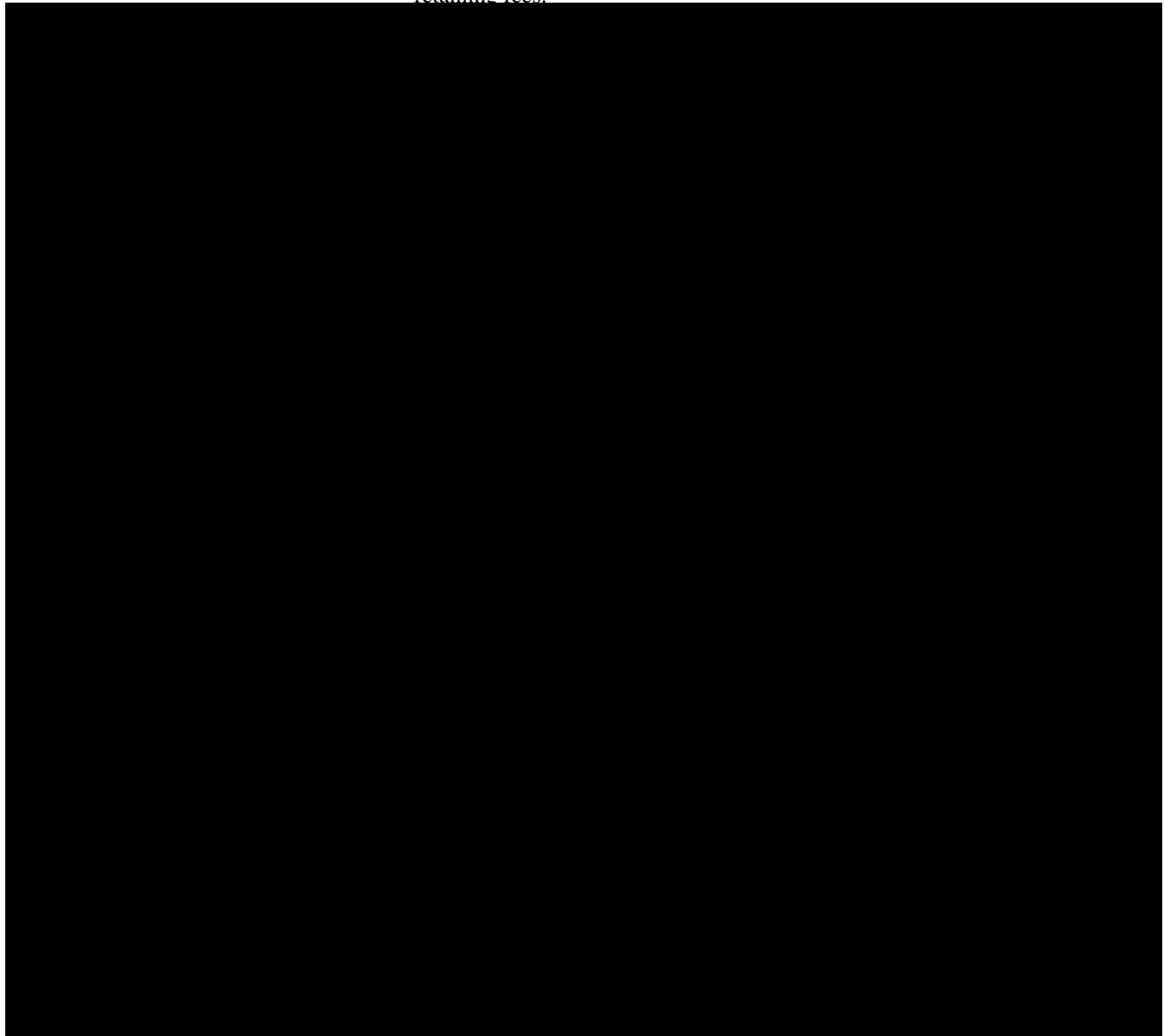
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Page 8

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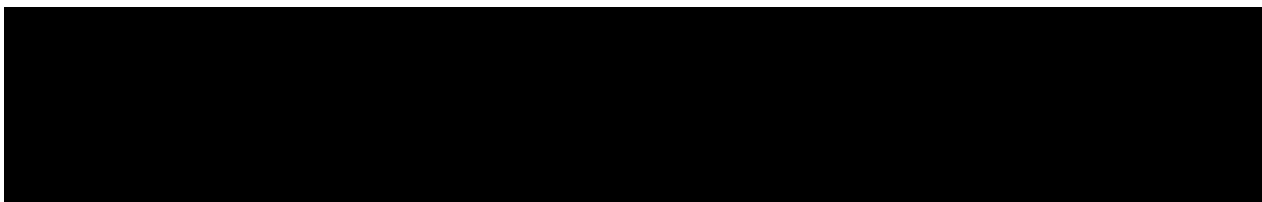
07/18/22	Kara B. Hendricks	Correspond with K. Dean regarding additional time to file motion regarding retaining fees.	0.10	48.02
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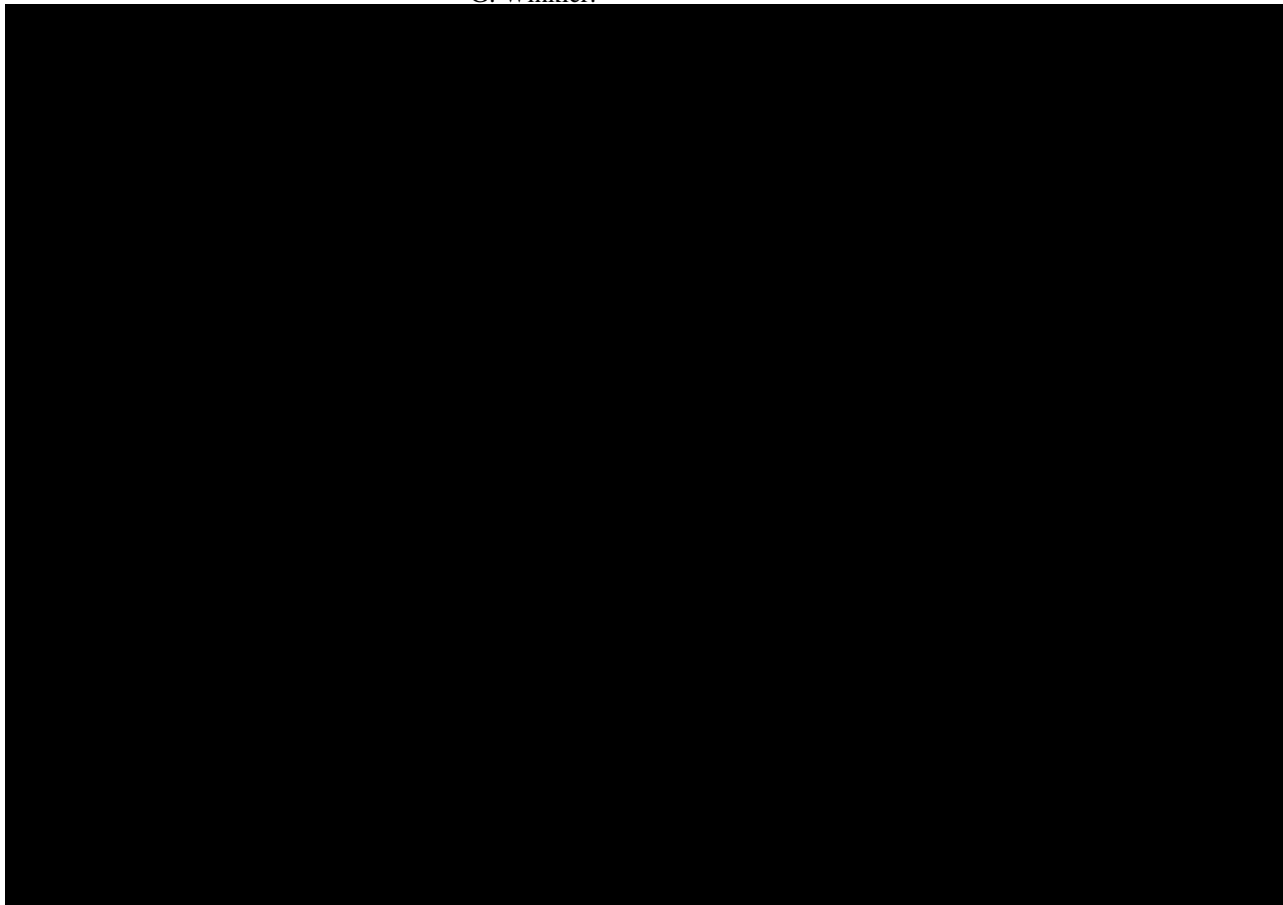
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Matter No.: 209375.010100

Page 9

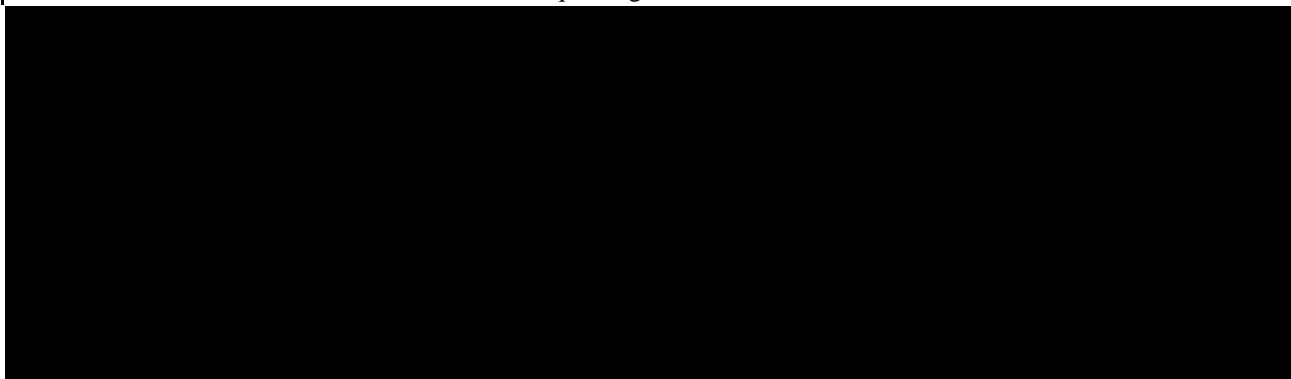
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07/19/22	Kara B. Hendricks	Review new information from K. Dean regarding motion to retain fees and update G. Winkler.	0.10	48.02
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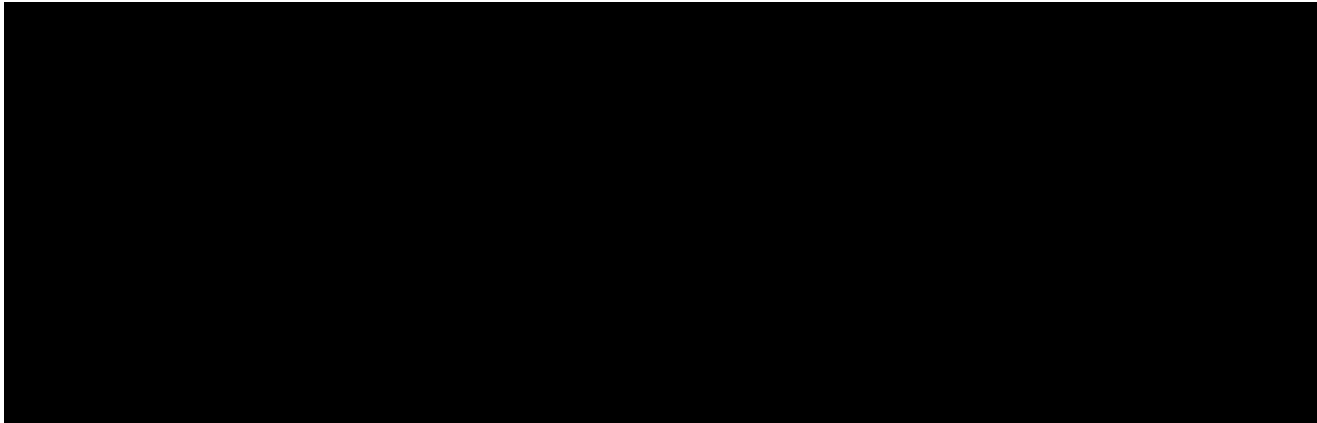
07/19/22	Jason Hicks	Review communications from Kamille Dean (Judd) regarding her desire to retain over \$200k in funds, and issues concerning her anticipated filing of a motion with the court requesting the same.	0.10	36.12
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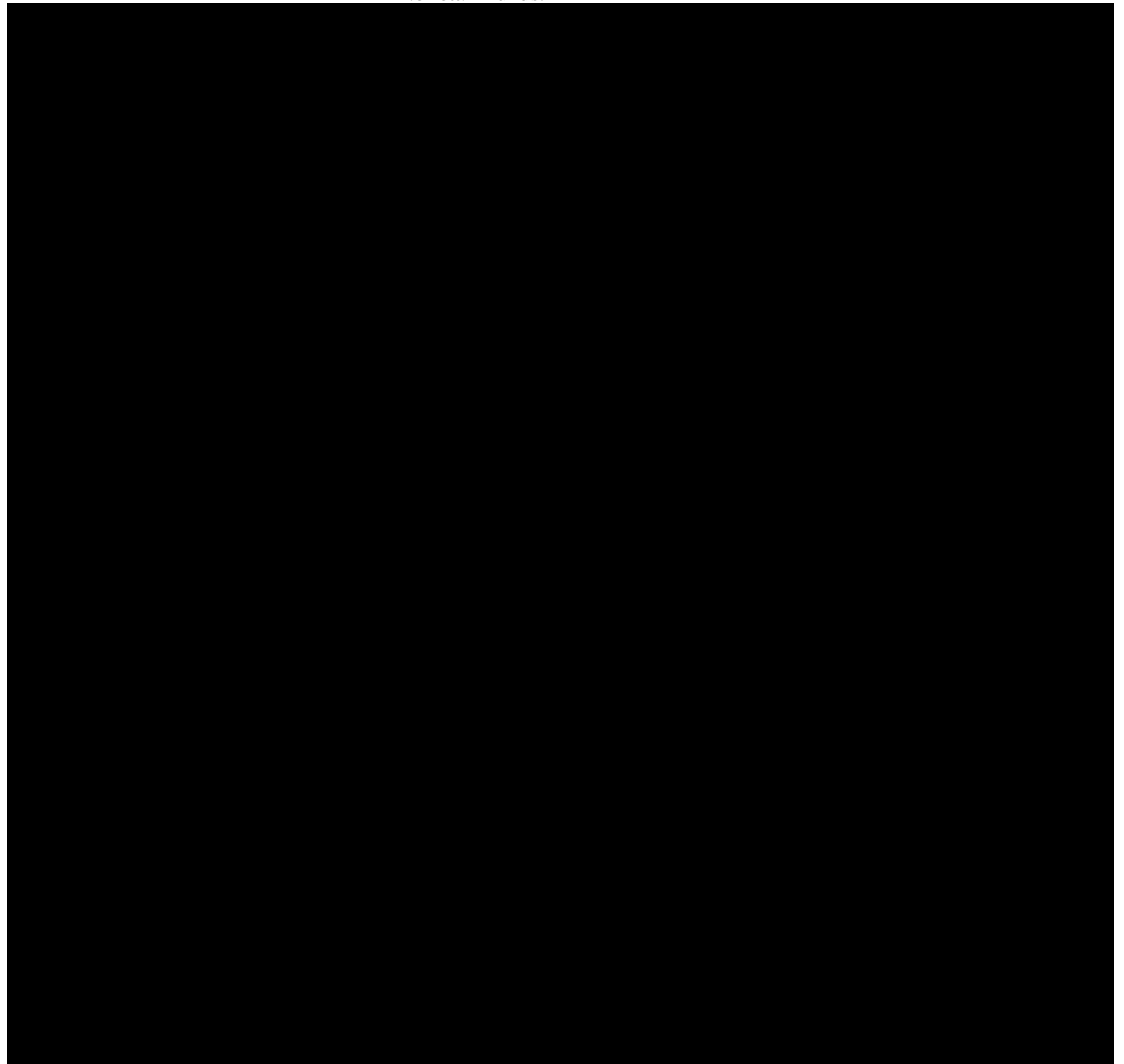
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Matter No.: 209375.010100

Page 10

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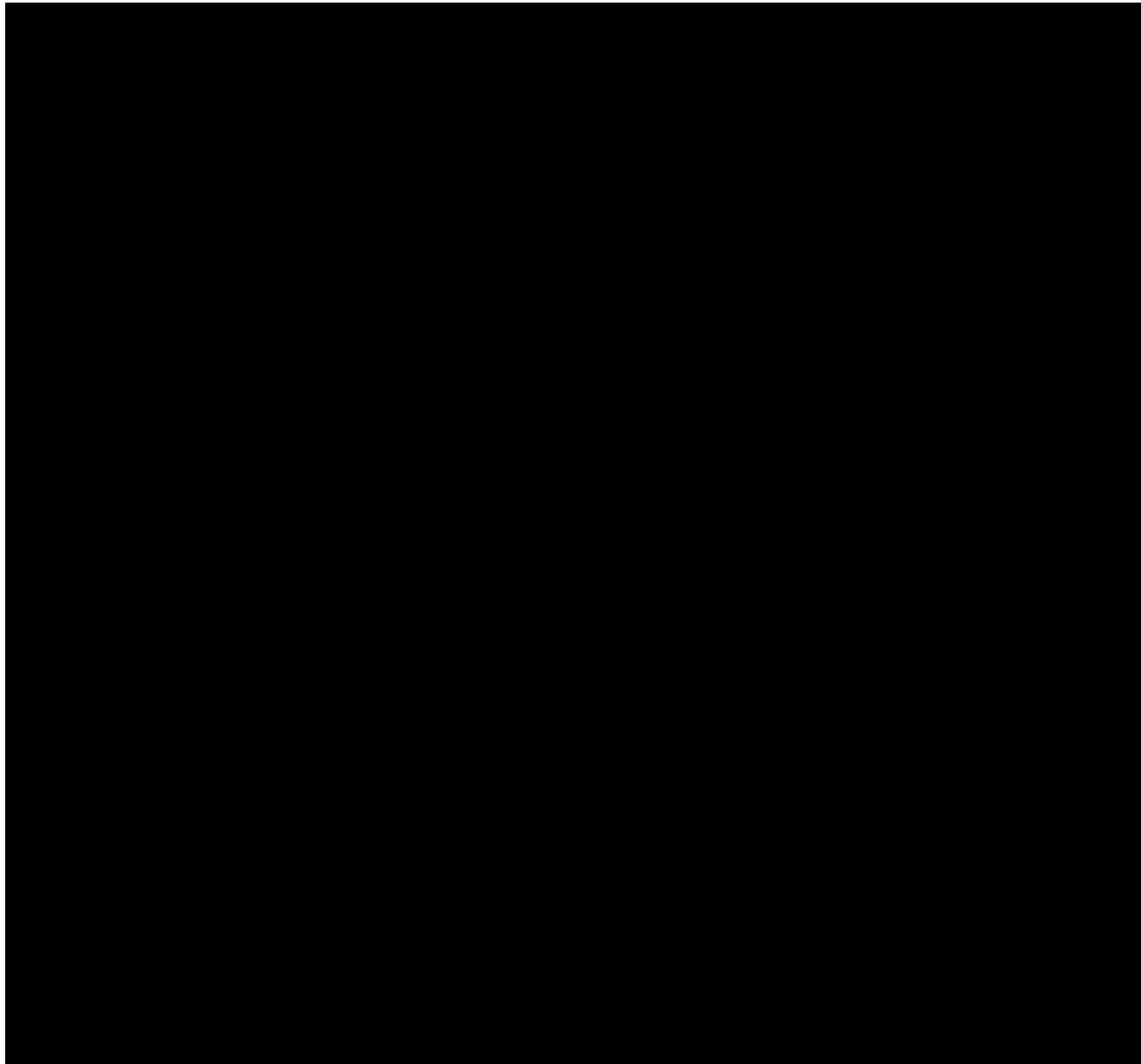
07/20/22	Kara B. Hendricks	Correspond with K. Dean regarding motion to retain funds.	0.10	48.02
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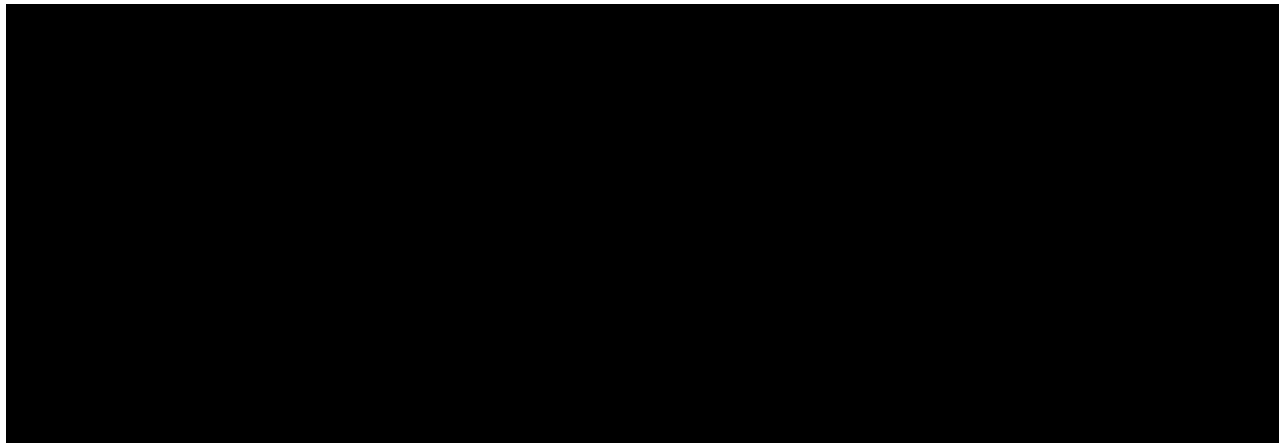
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Matter No.: 209375.010100

Page 12

Description of Professional Services Rendered





07/22/22	Kara B. Hendricks	Follow-up with K. Dean regarding motion to retain fees.	0.10	48.02
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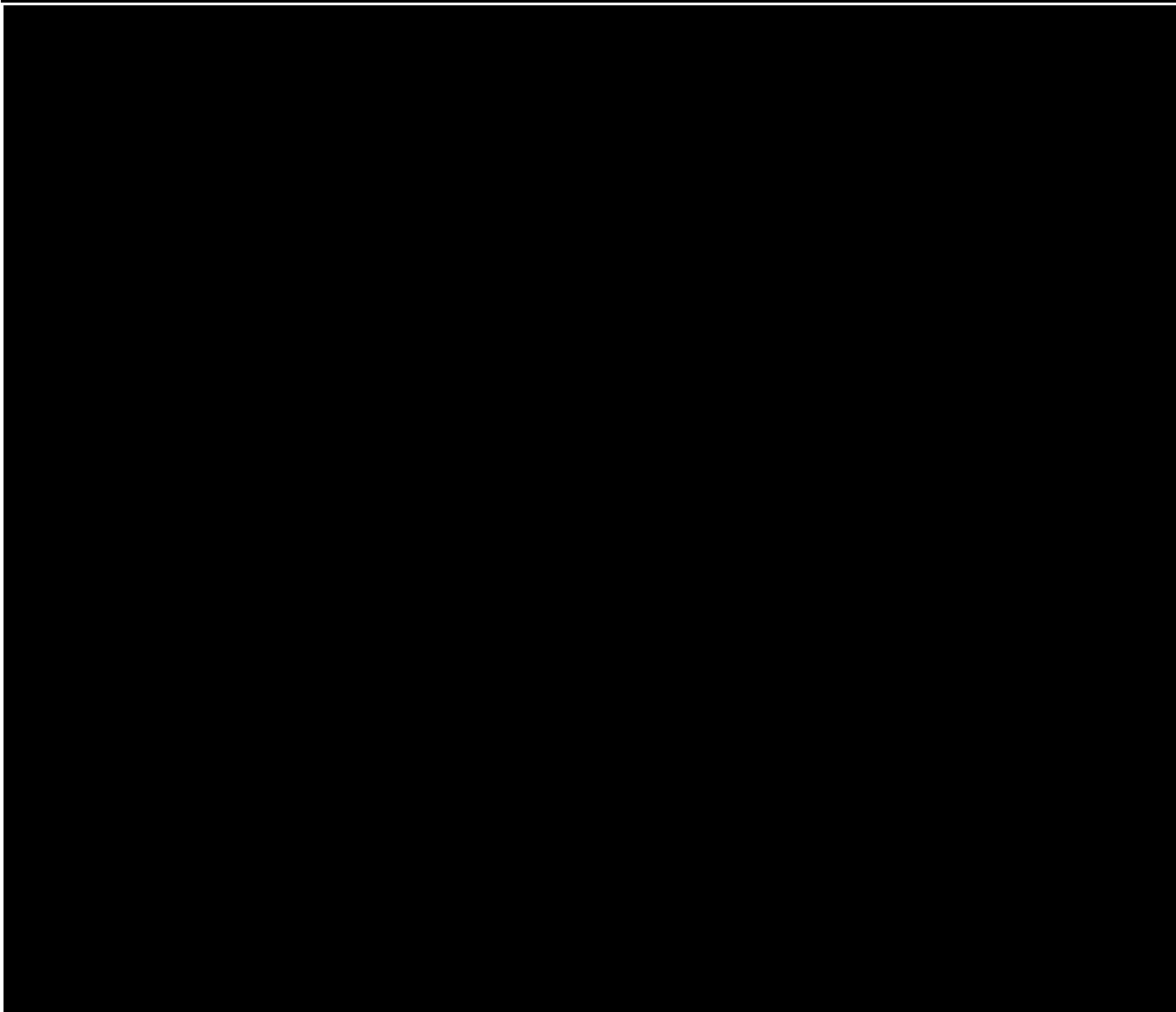
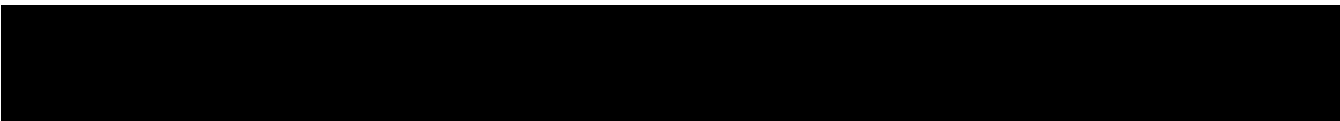


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Matter No.: 209375.010100

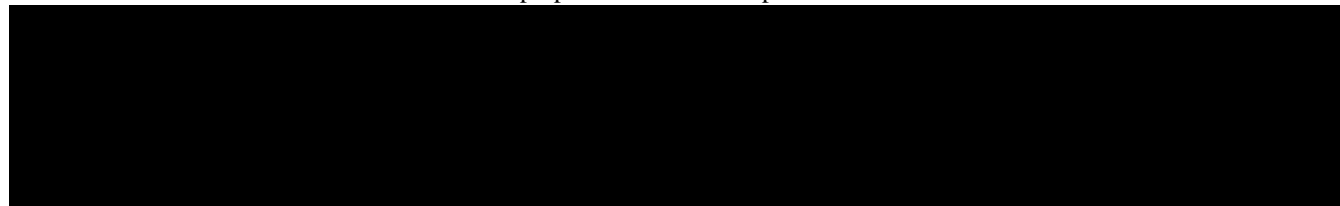
Page 14

Description of Professional Services Rendered

07/27/22	Kara B. Hendricks	 	Further correspondence with K. Dean on motion for fees; Follow-up with G. Winkler and Request C. Spaulding work on motion to compel re: Dean noncompliance.	0.50	240.12
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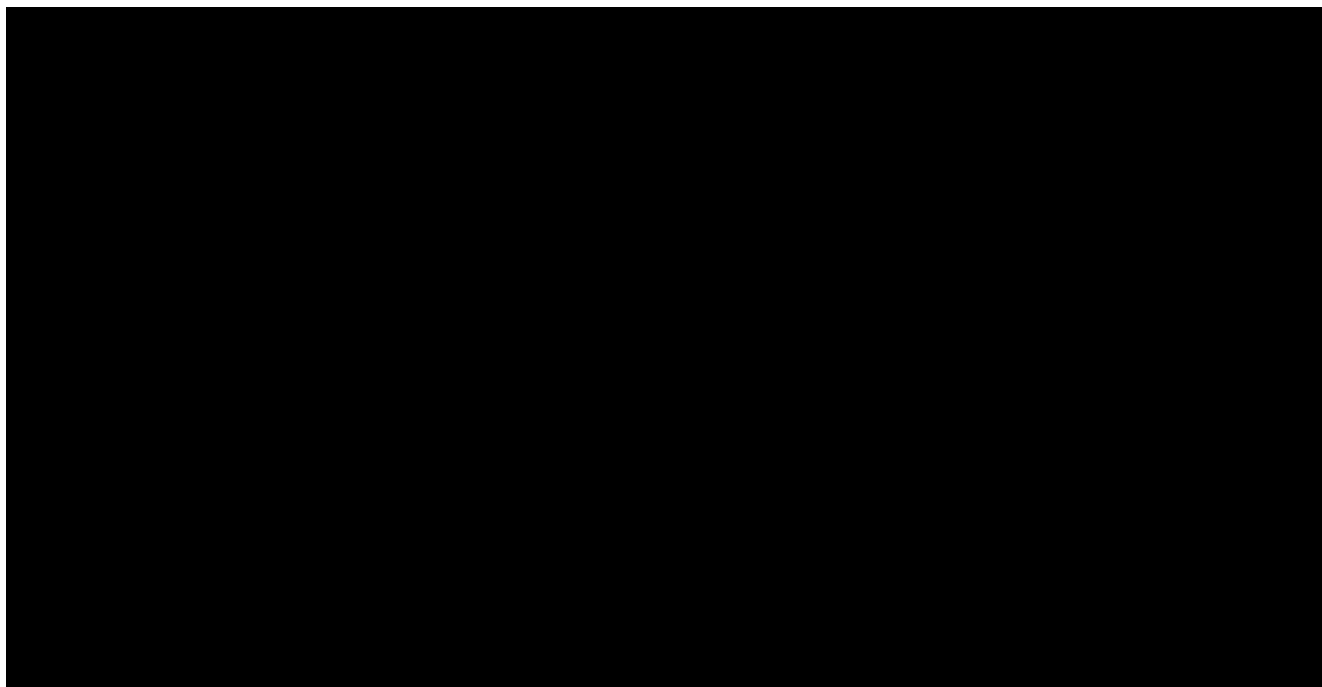
07/28/22	Kara B. Hendricks		Review correspondence regarding K. Dean and prepare motion to compel.	1.10	528.27
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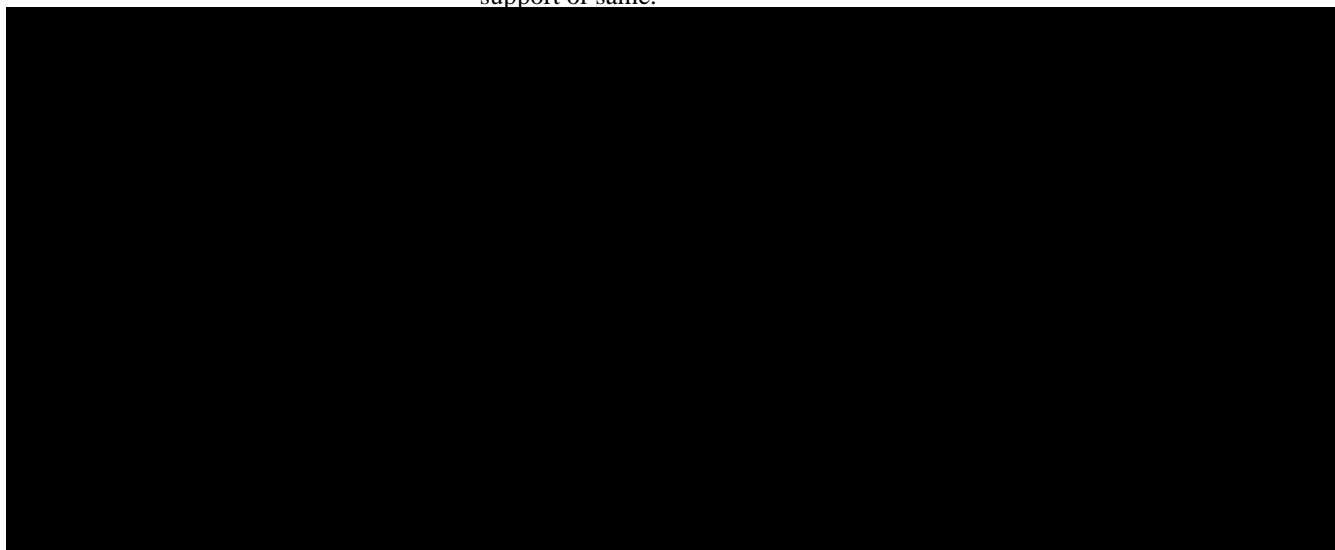
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Matter No.: 209375.010100

Page 15

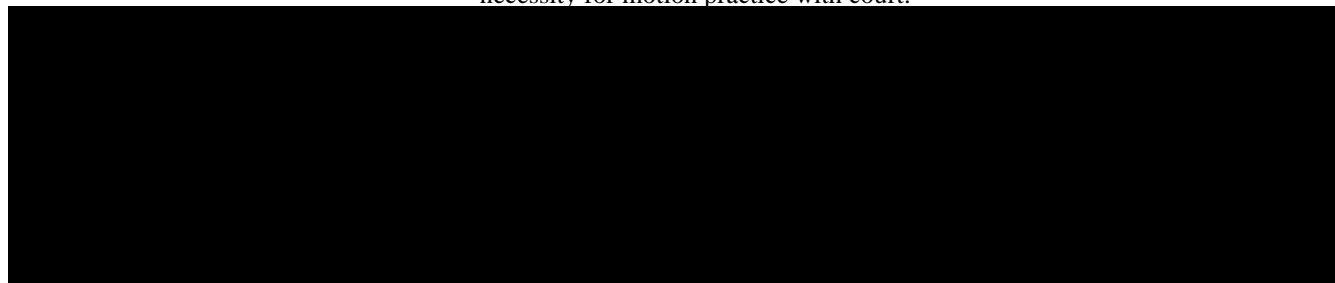
Description of Professional Services Rendered



07/29/22	Kara B. Hendricks	Prepare motion to compel K. Dean turnover of funds including incorporate information from D. Zaro regarding communication with Ms. Dean; Prepare declarations of Zaro and Hendricks in support of same.	3.40	1,632.85
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07/31/22	Jason Hicks	Strategize with receivership team regarding Kamille Dean (Judd attorney) who is refusing to turn over all funds, and necessity for motion practice with court.	0.10	36.12
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Invoice No.: 1000142381
File No. : 209375.010100
Bill Date : November 9, 2022

Geoff Winkler
715 NW Hoyt Street, Suite 4364
Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES INVOICE 1000112328

Total Fees: \$ 83,894.08

Expenses:

Information and Research 316.80

Total Expenses: \$ 316.80

Current Invoice: \$ 84,210.88

Previous Balance (see attached statement): \$ 122,381.16

Total Amount Due: \$ 206,592.04

KBH:LC
Tax ID: 13-3613083

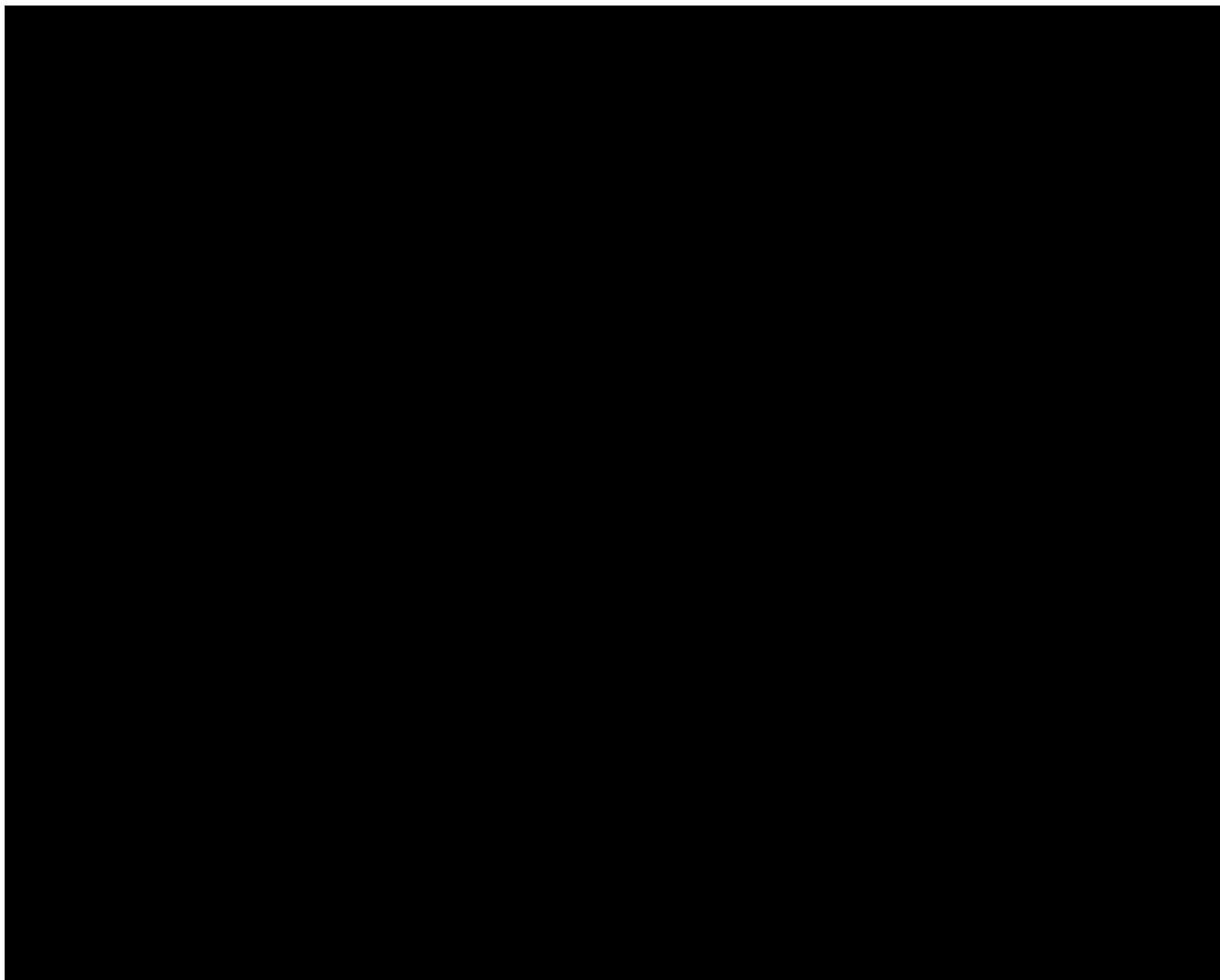
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Page 1

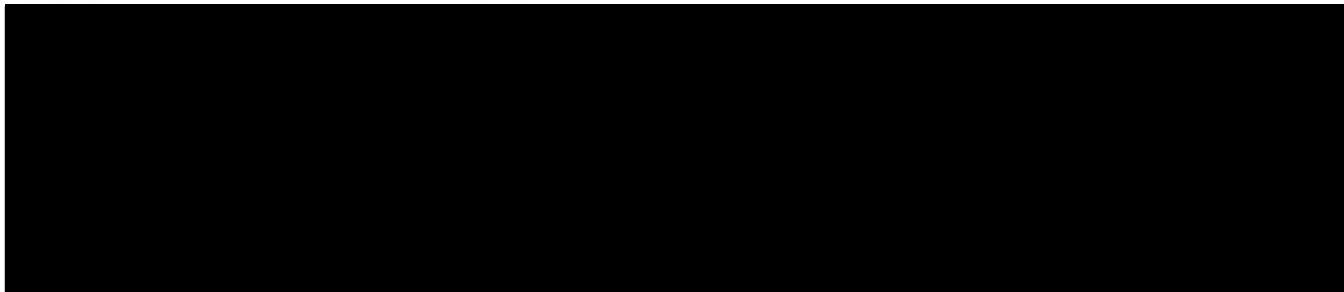
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TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

DATE TIMEKEEPER DESCRIPTION HOURS AMOUNT



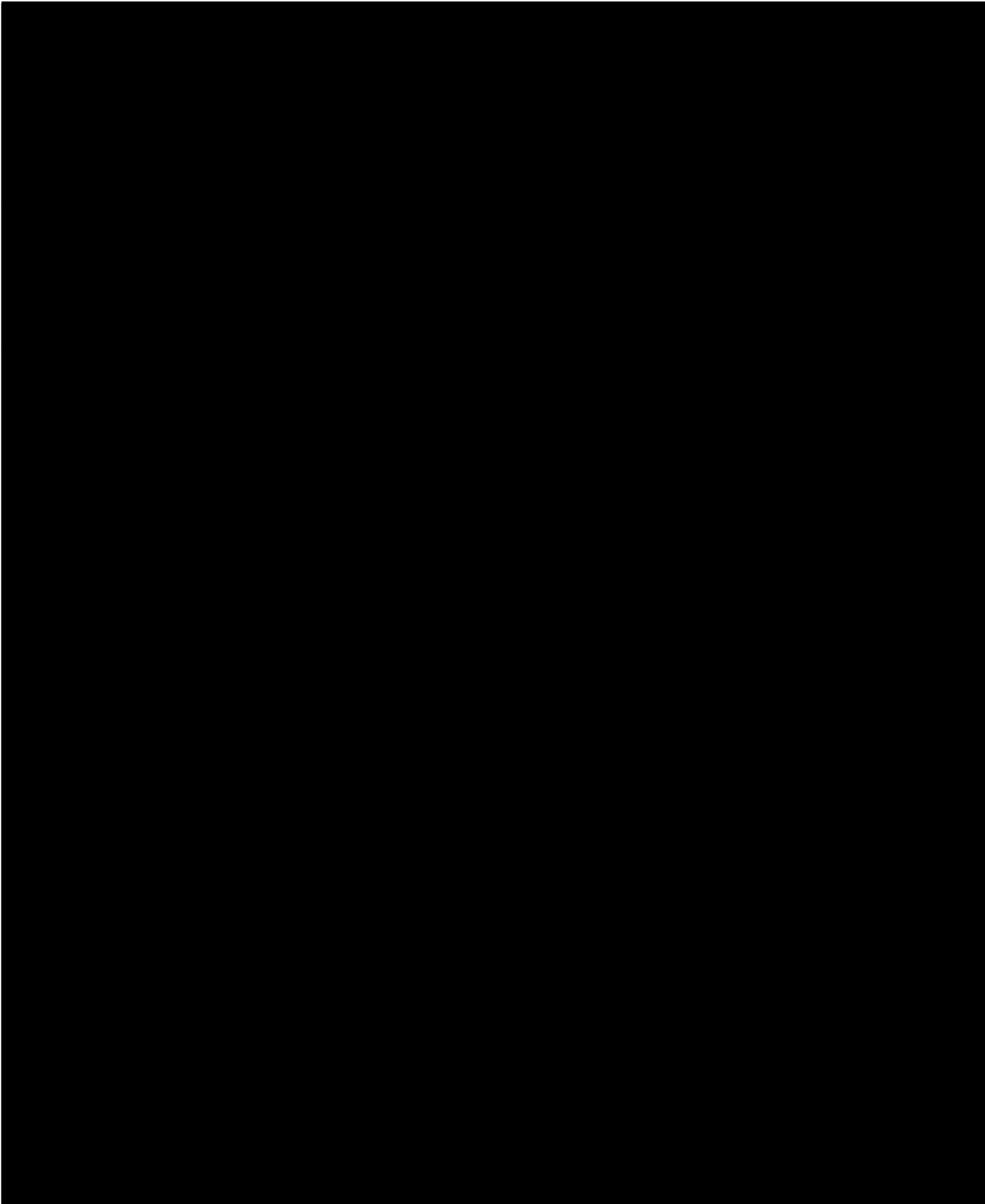
08/01/22	Kara B. Hendricks	Attention to motion to compel regarding K. Dean and follow-up regarding original source of funds we are seeking to recover, update declarations and finalize pleadings and exhibits;	1.30	624.33
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Invoice No.: 1000142381
Matter No.: 209375.010100

Page 2

Description of Professional Services Rendered



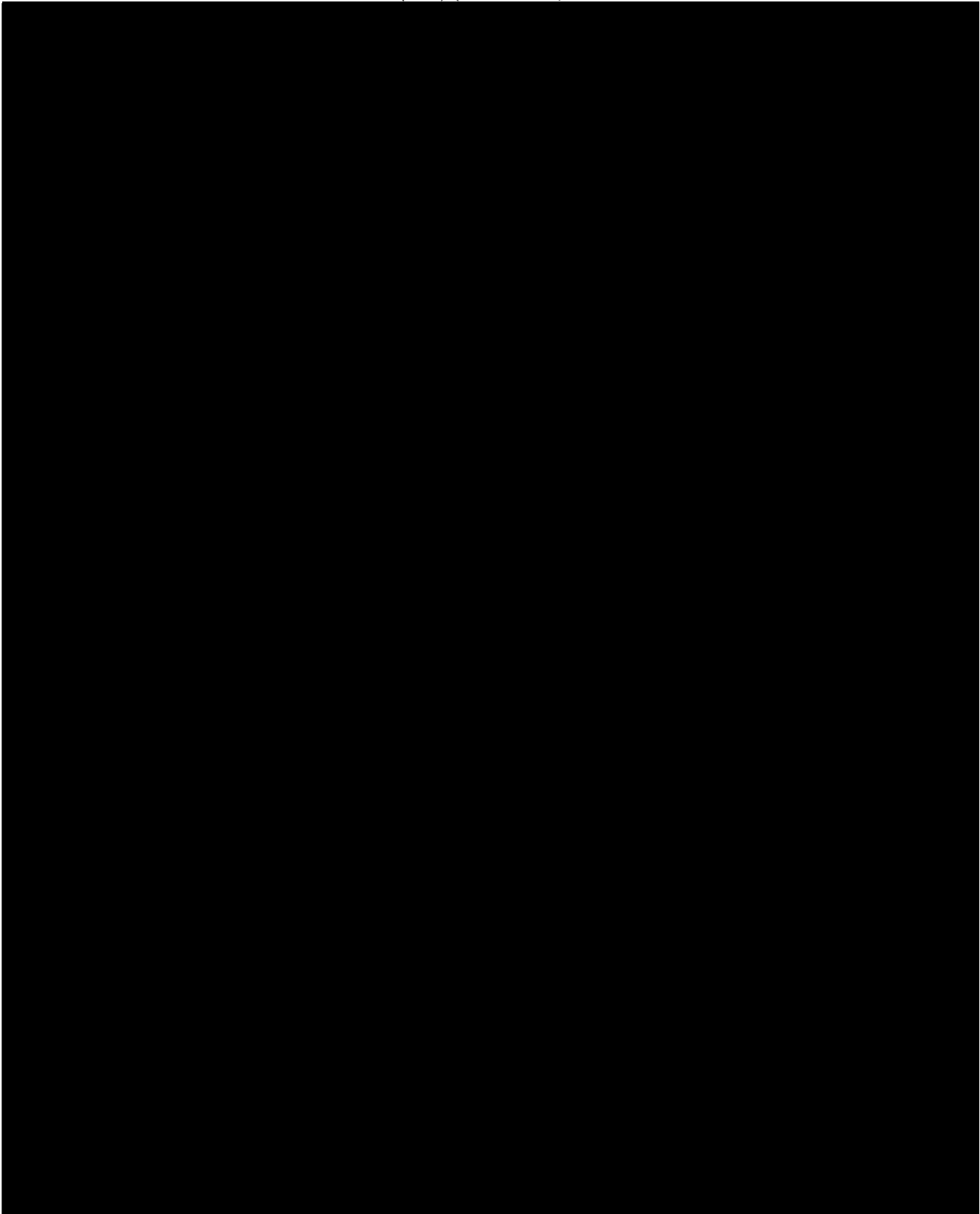
08/02/22	Jason Hicks	Review motion for order to show cause/compel Kamille Dean to turn over	0.20	72.25
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Invoice No.: 1000142381
Matter No.: 209375.010100

Page 3

Description of Professional Services Rendered

\$201k (Judd) (ECF No 210)

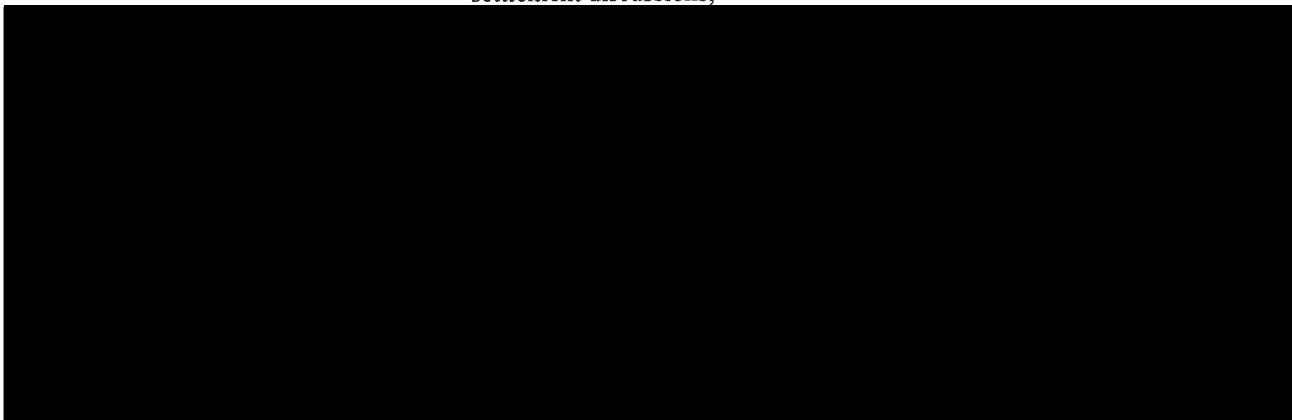


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Matter No.: 209375.010100

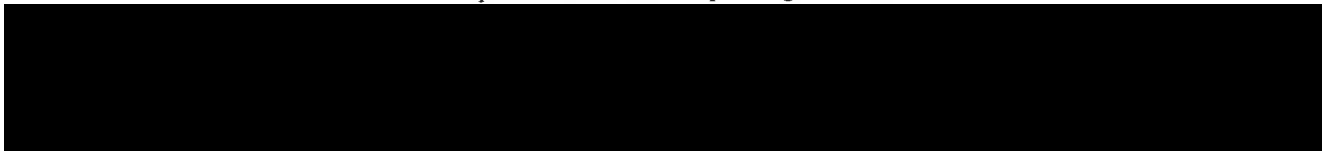
Description of Professional Services Rendered



08/10/22	Kara B. Hendricks	Attention to correspondence from K. Dean regarding turnover of funds and proposed settlement discussions;	0.20	96.05
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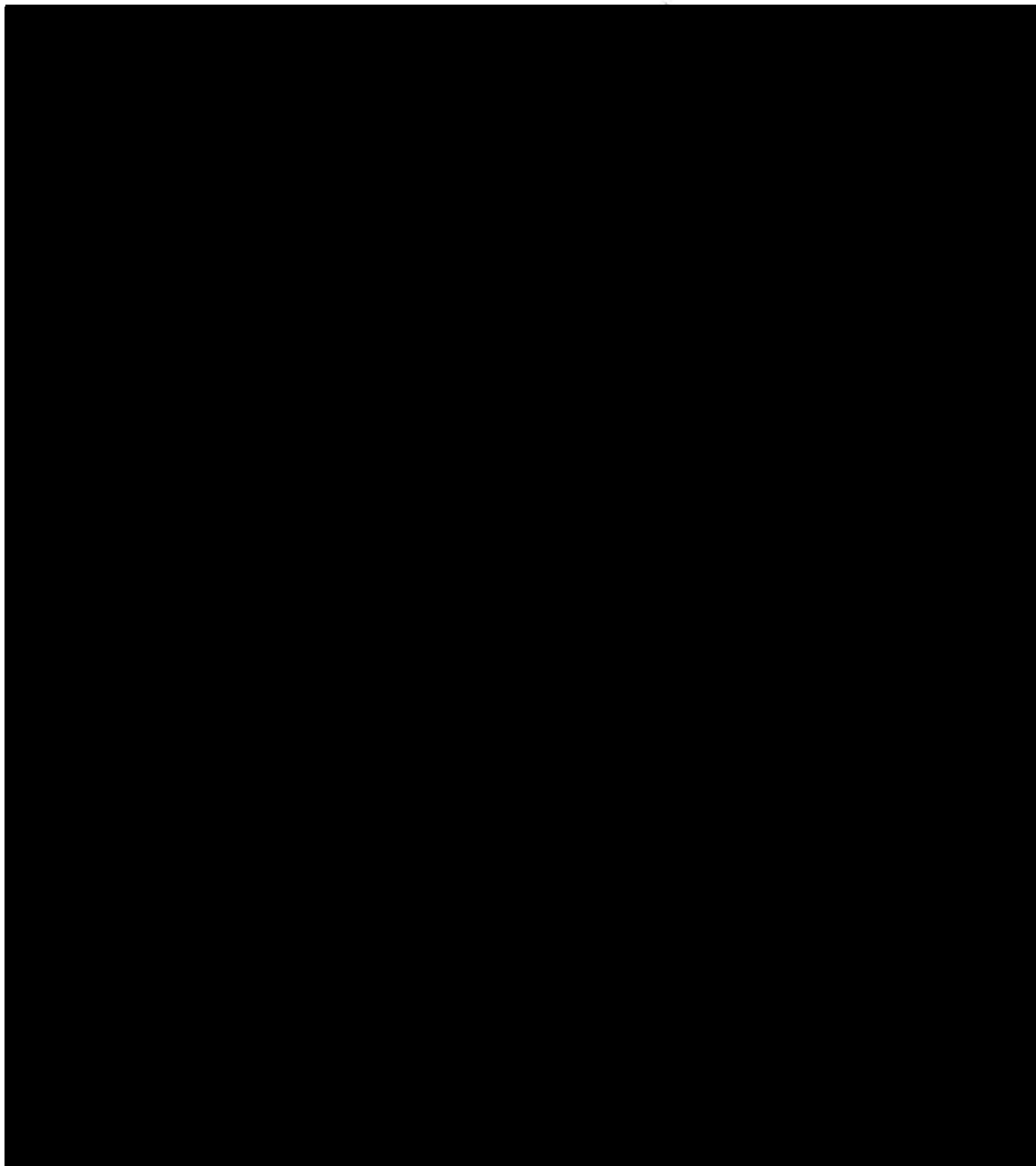
08/11/22	Kara B. Hendricks	Respond to K. Dean email regarding funds provided to Judd and pending motion;	0.10	48.03
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Invoice No.: 1000142381
Matter No.: 209375.010100

Page 13

Description of Professional Services Rendered



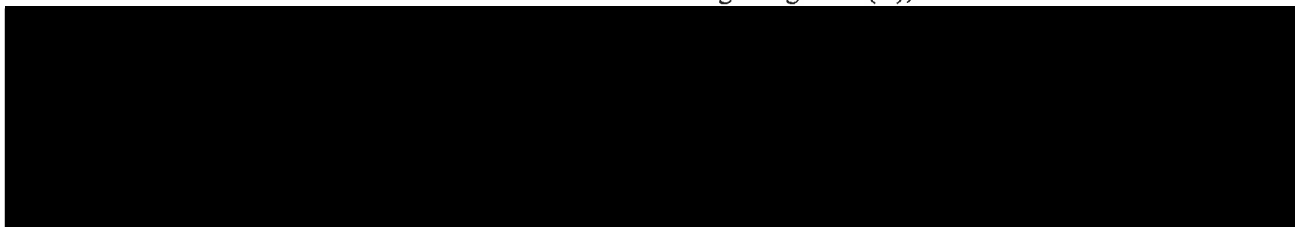
08/16/22	Kara B. Hendricks	Attention to multiple documents provide by K. Dean including opposition to motion to compel, motion to strike, objection to affidavits, motion for leave to file interpleader(.6); Discuss preparation of response to same with C. Spaulding and	0.90	432.23
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Invoice No.: 1000142381
Matter No.: 209375.010100

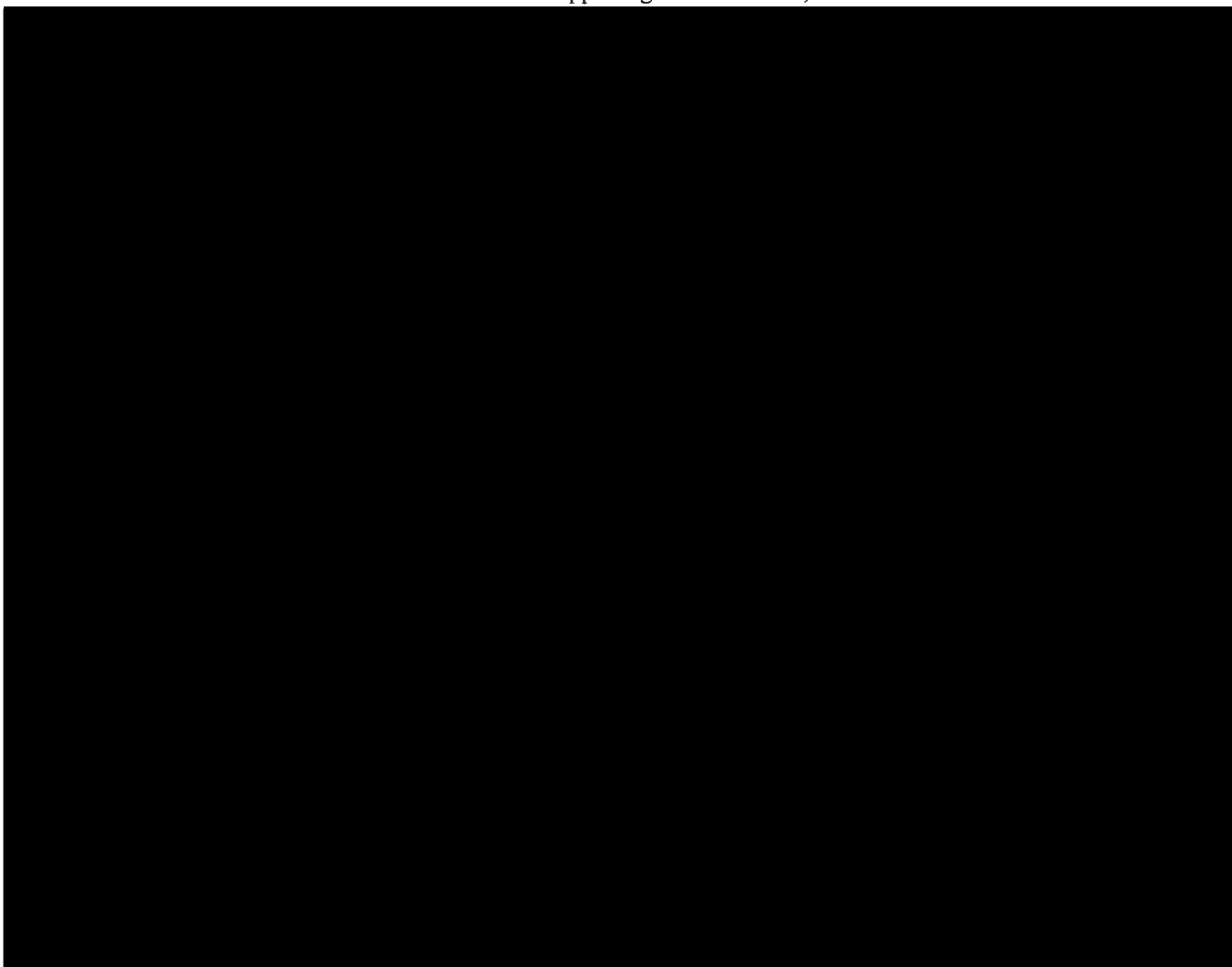
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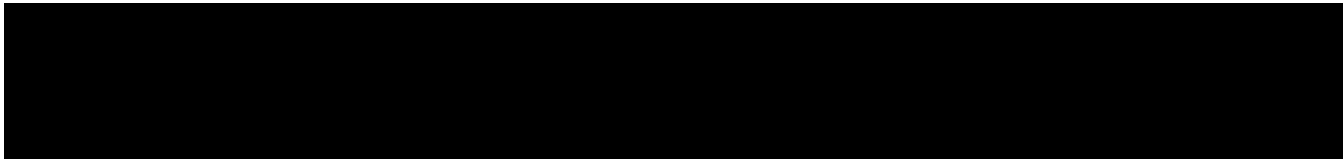
outline issues to address (.2); Respond to email from C. Fronk regarding same (.1);



08/16/22	Kara B. Hendricks	Review supporting documents submitted with D. Motion and prepare email to K. Dean to clarify issues therein and seeking documents supporting retainer claims;	0.30	144.08
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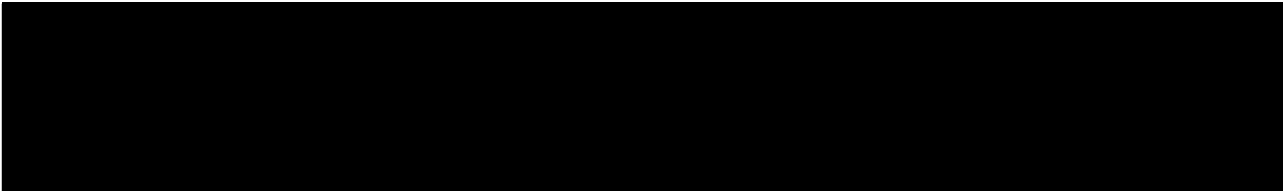


08/16/22	Christian Spaulding	Confer with team regarding arguments to be made in response to Motions filed by K. Dean and deadlines for the same.	0.90	286.88
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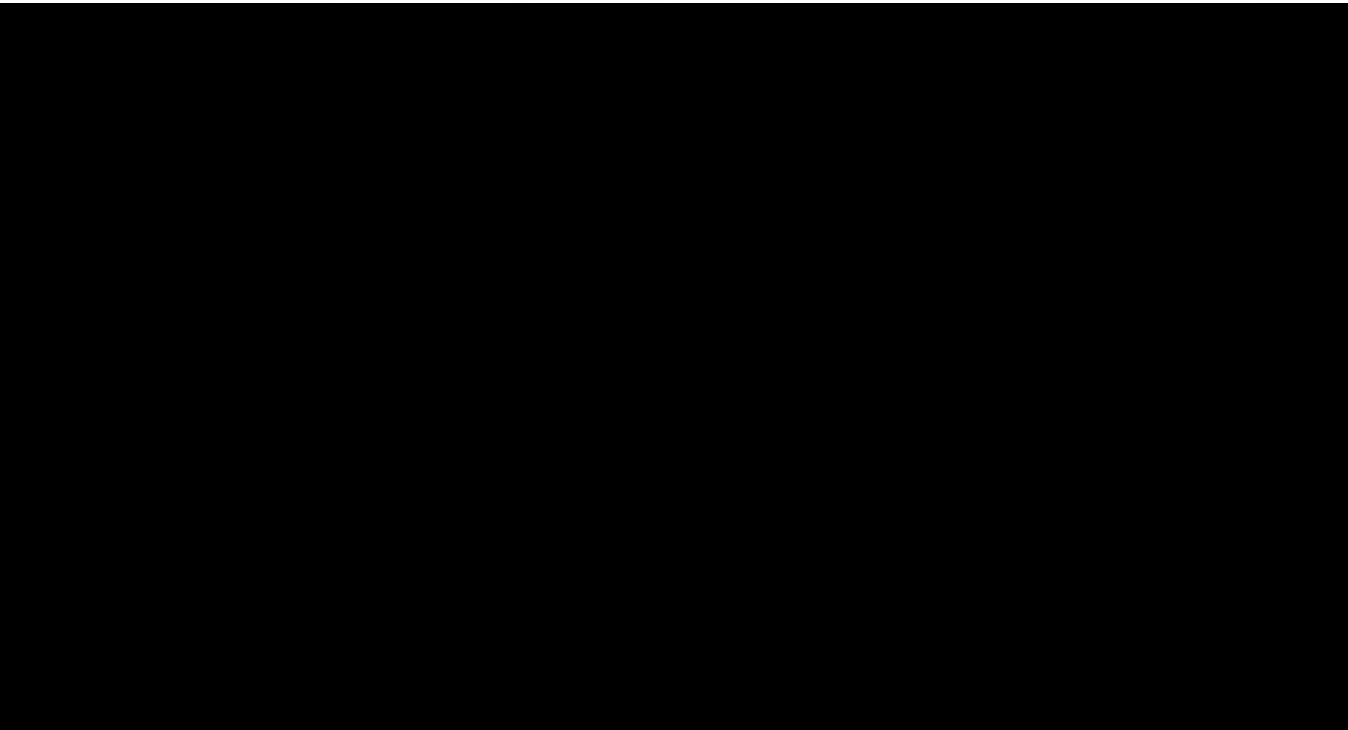


Invoice No.: 1000142381
Matter No.: 209375.010100

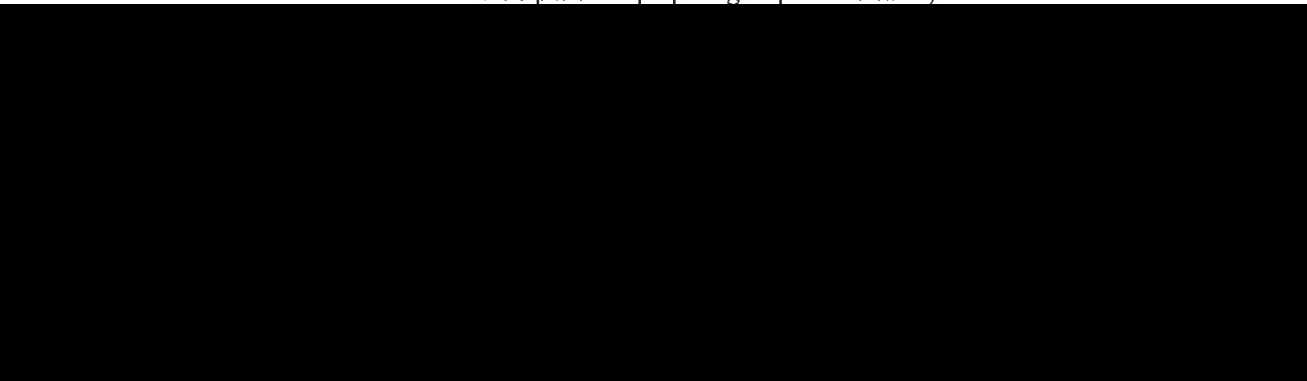
Page 18

Description of Professional Services Rendered

08/19/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding preparation of response to K. Dean motions and provide additional guidance regarding same including updated time summary;	0.30	144.08
08/19/22	Kara B. Hendricks	Call with C. Fronk to discuss K. Dean filings and background regarding funds at issue;	0.20	96.05



08/19/22	Christian Spaulding	Evaluate motions filed by Kamille Dean (ECF Nos. 257, 258, 259, and 260) in anticipation of preparing response to same;	1.50	478.13
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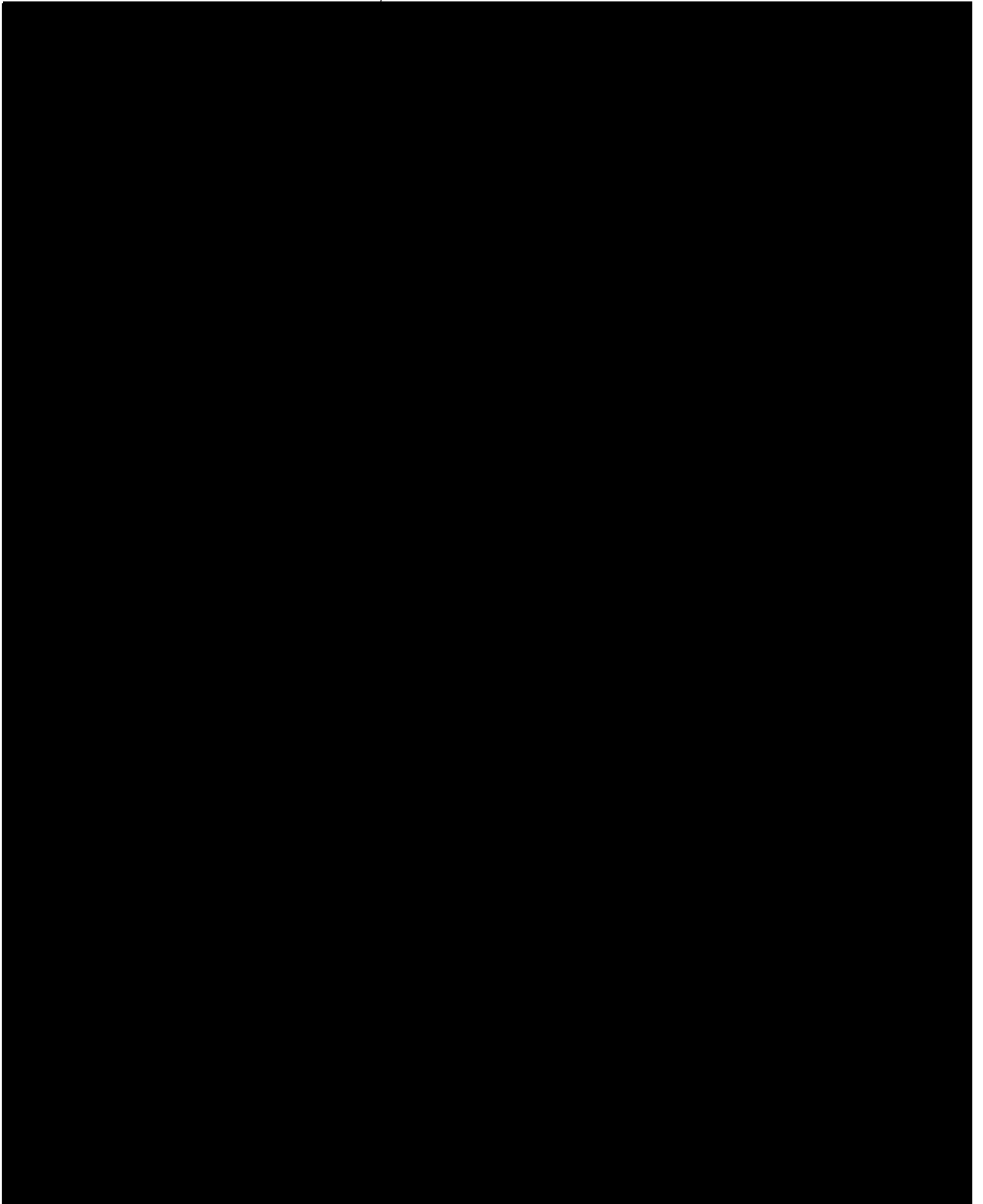
08/22/22	Kara B. Hendricks	Respond to email from K. Dean regarding pending motions and funds received from	0.10	48.03
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Invoice No.: 1000142381
Matter No.: 209375.010100

Page 19

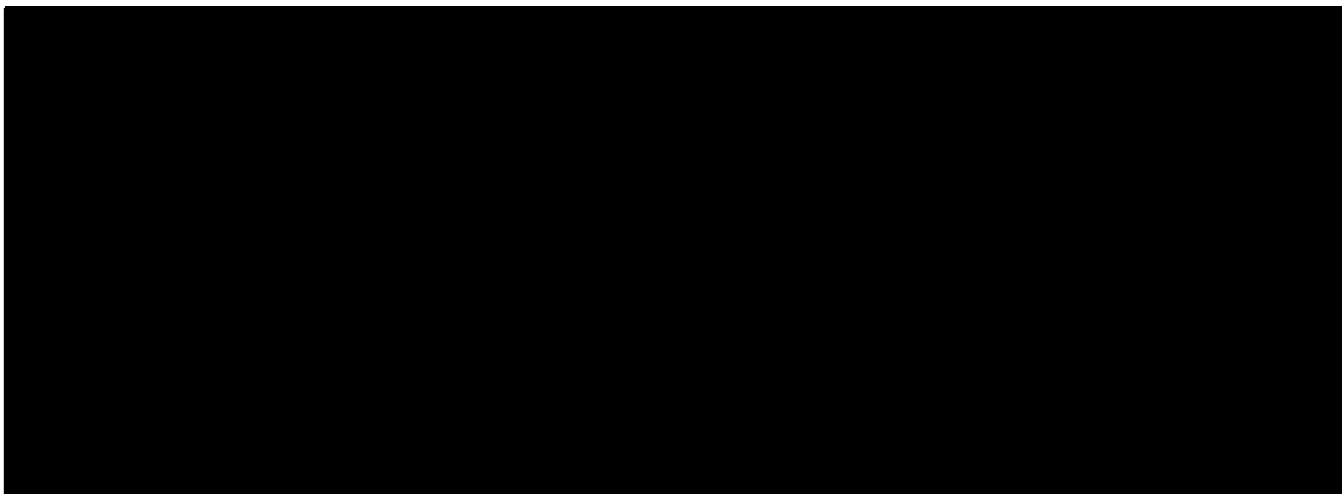
Description of Professional Services Rendered

Judd;

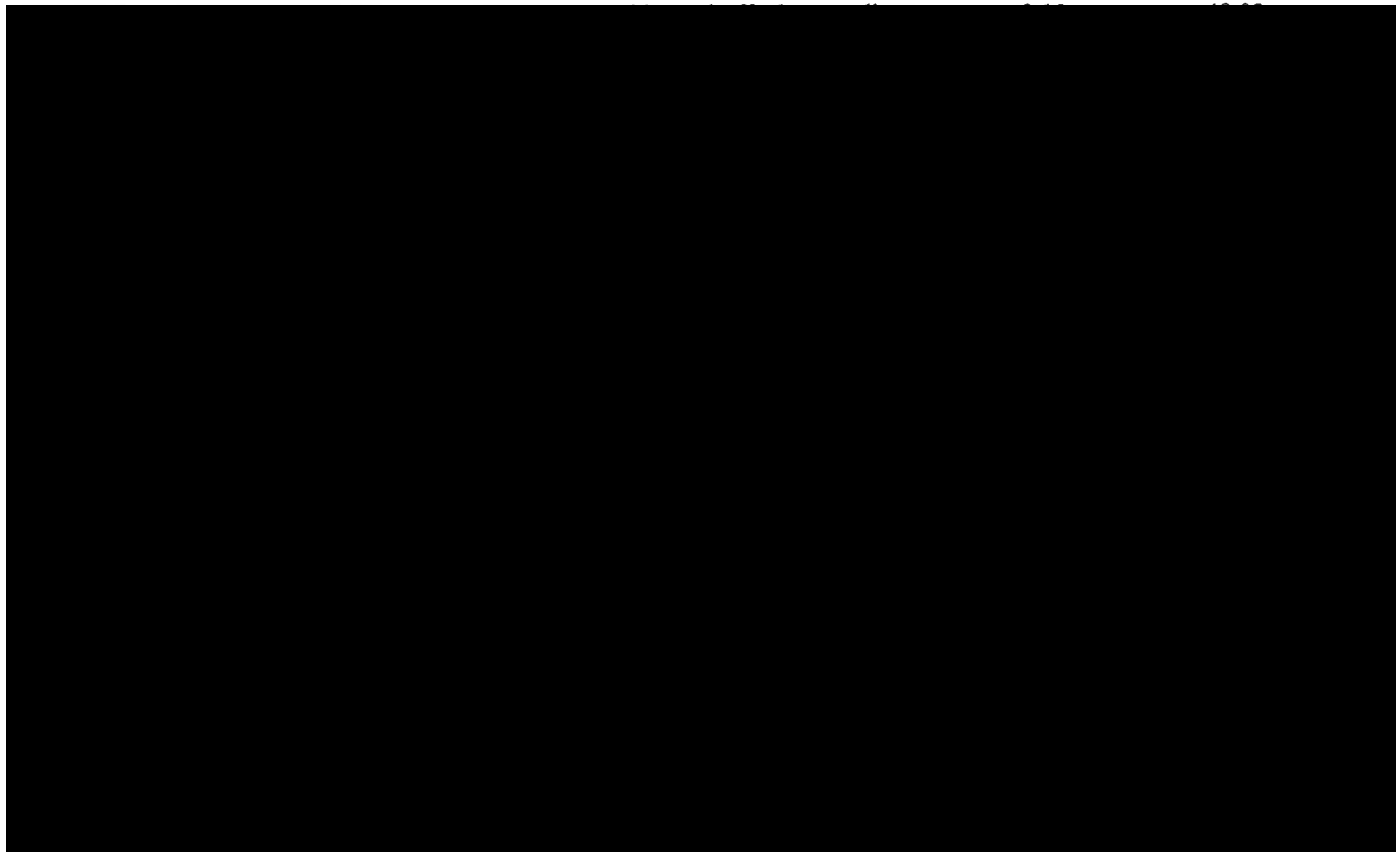


Invoice No.: 1000142381
 Matter No.: 209375.010100

Description of Professional Services Rendered



08/24/22	Christian Spaulding	Draft Omnibus Opposition to four motions filed by Kamille Dean.	9.20	2,932.50
08/24/22	Christian Spaulding	Evaluate relevant case law regarding application of 28 USC 754, personal jurisdiction, and other arguments raised by Kamille Dean in her motions.	3.70	1,179.38

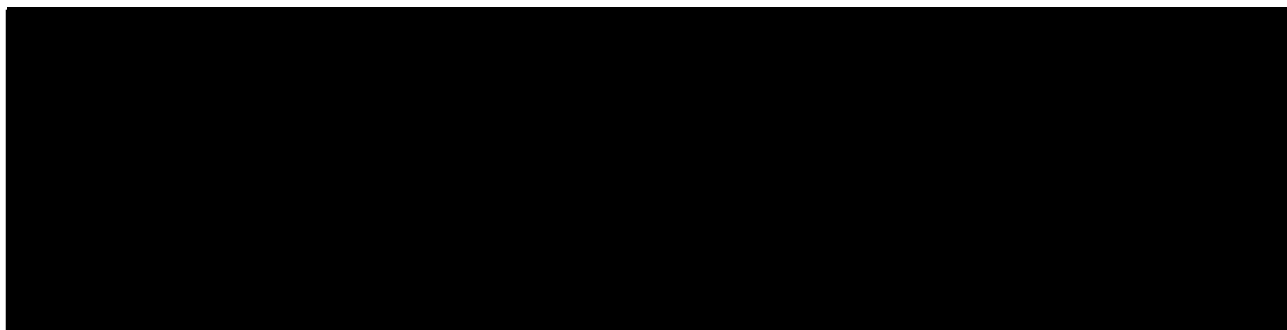


08/25/22	Kara B. Hendricks	Review and revise Omnibus response to Dean motions regarding funds retained from Judd;	4.40	2,113.10

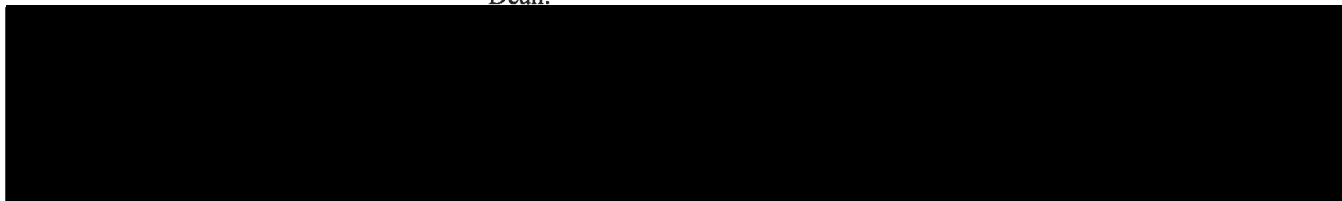
Invoice No.: 1000142381
 Matter No.: 209375.010100

Page 22

Description of Professional Services Rendered



08/25/22	Christian Spaulding	Revise and finalize draft of Omnibus Opposition to Motions filed by Kamille Dean.	4.10	1,306.88
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08/26/22	Kara B. Hendricks	Continue review and revisions to response to Dean Motions including follow-up with C. Spaulding regarding same, circulating draft for review, and incorporating comments received;	6.10	2,929.53
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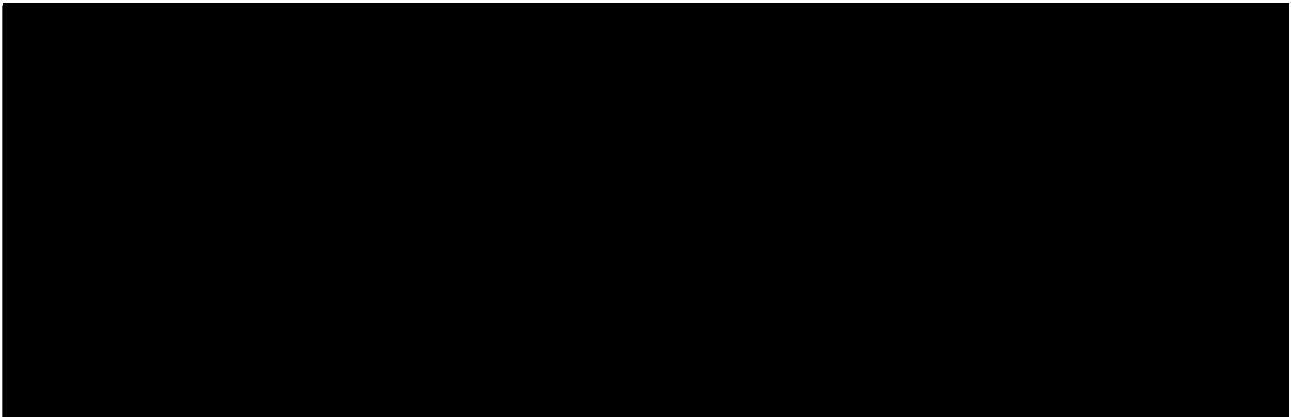


08/26/22	Cynthia L. Ney	Review and editing of Omnibus motion response, including incorporating Allen Matkins revisions and preparation of supporting exhibits (1.6); communications with K.Hendricks regarding same (.1).	1.70	297.50
08/26/22	Christian Spaulding	Evaluate revisions to Opposition to Kamille Dean motions from J. del Castillo including review of SEC v. Ross and its application to this case.	1.00	318.75
08/26/22	Christian Spaulding	Confer with K. Hendricks regarding the Ninth Circuit's holding in SEC v. Ross and its application to this case and the motions filed by Kamille Dean.	0.30	95.63
08/26/22	Christian Spaulding	Confer with K. Hendricks regarding application of SEC v. Ross to the instant dispute with Kamille Dean regarding summary v. plenary proceedings.	0.40	127.50
08/27/22	Kara B. Hendricks	Review emails and follow-up with C. Spaulding regarding requested revisions to Dean response;	0.10	48.03
08/28/22	Christian Spaulding	Proofread and revise omnibus response to Kamille Dean Motions per comments from co-counsel and client.	0.90	286.88

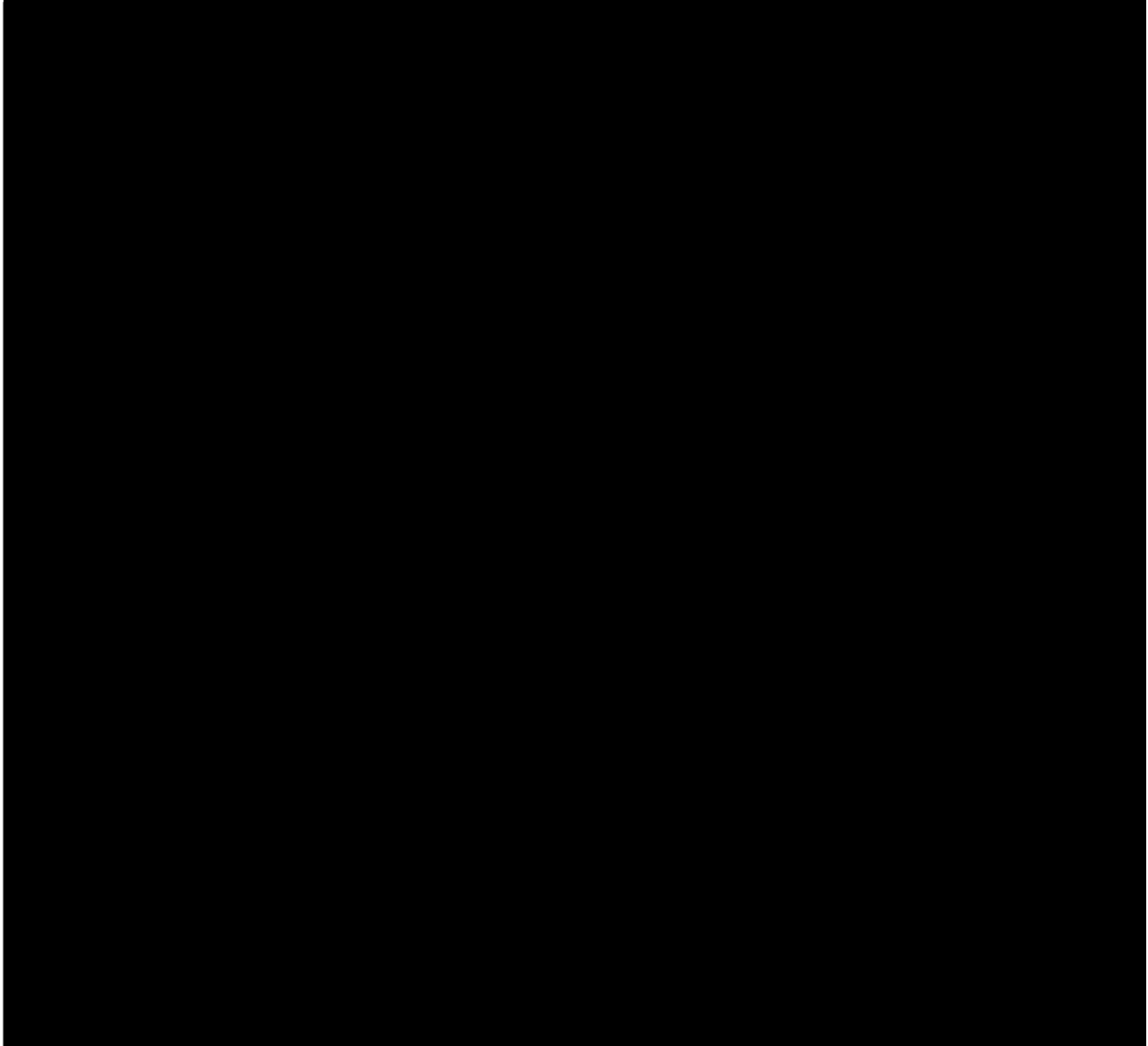
Invoice No.: 1000142381
Matter No.: 209375.010100

Page 23

Description of Professional Services Rendered



08/29/22	Kara B. Hendricks	Update and finalize response to Dean Motions and notice of non-opposition to Dean Motion to Compel;	0.80	384.20
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Invoice No.: 1000142381
Matter No.: 209375.010100

Page 24

Description of Professional Services Rendered



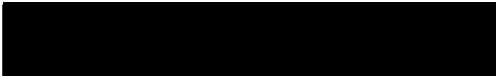
08/30/22	Kara B. Hendricks	Attention to SEC response to Dean motion for leave to file interpleader;	0.10	48.03
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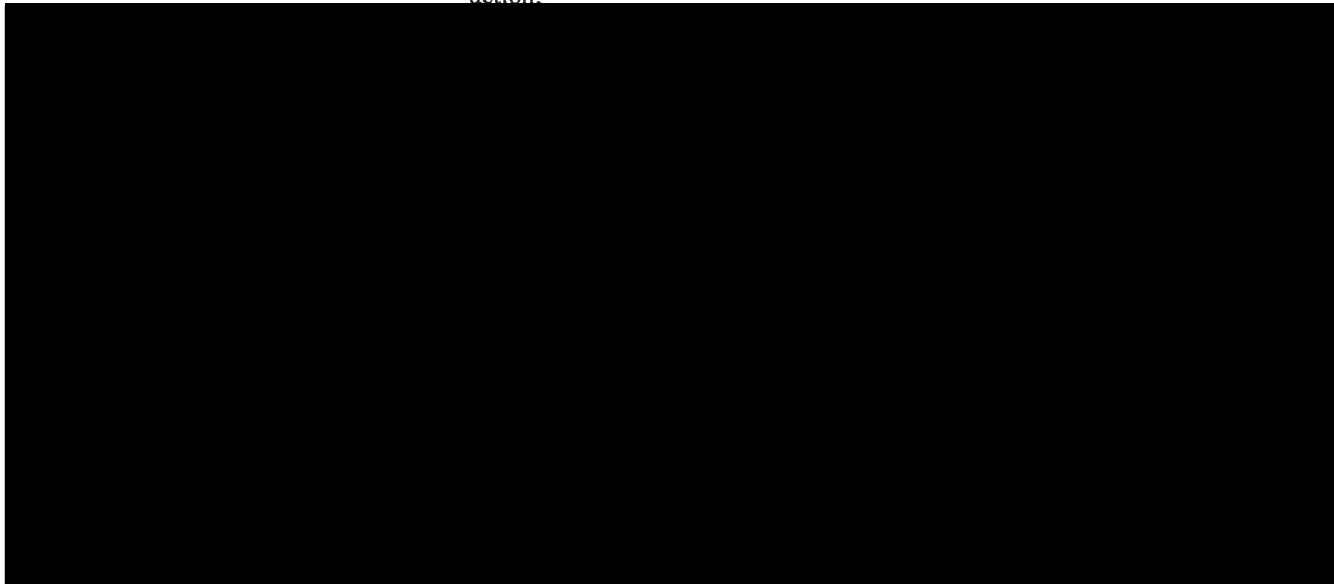


Invoice No.: 1000142381
 Matter No.: 209375.010100

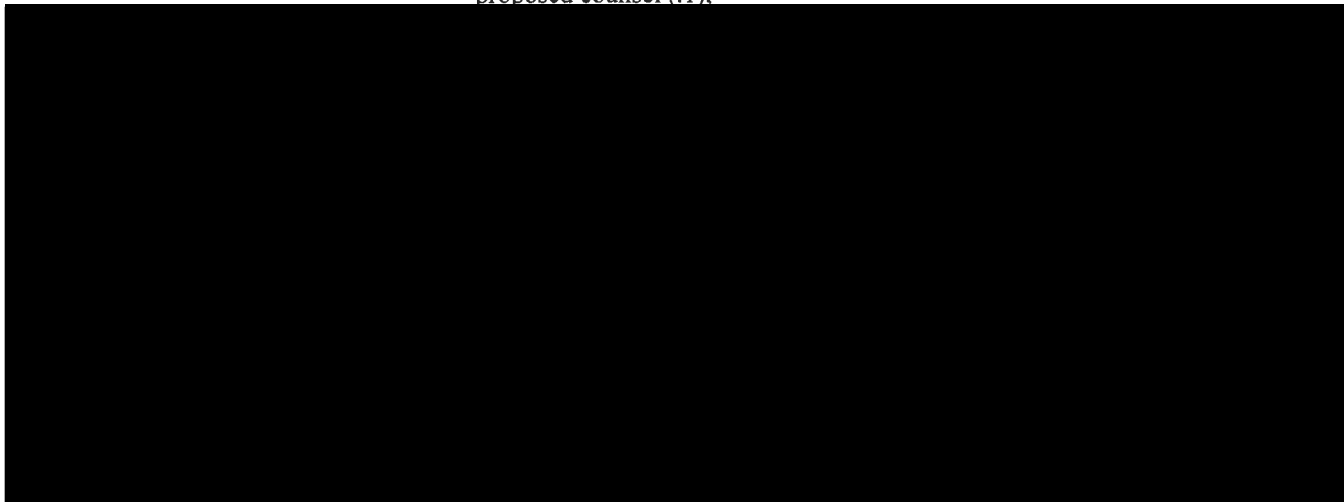
Page 27

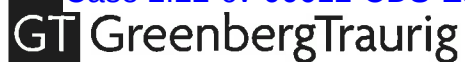
Description of Professional Services Rendered

08/23/22	Kara B. Hendricks	 Follow-up with C. Spaulding regarding Dean response and arguments to pending motions filed to keep funds and file new action:	0.20	96.05
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08/26/22	Kara B. Hendricks	Prepare notice of non opposition to K. Dean motion to compel;	0.30	144.08
08/30/22	Kara B. Hendricks	Correspond with J. Rickard regarding extension request he received on behalf of K. Dean;	0.10	48.03
08/31/22	Kara B. Hendricks	Attention to emails regarding Dean extension request and provide J. Rickard directive from G. Winkler regarding same (.2); Telephone call from J. Rickard regarding communication with K. Dean proposed counsel (.1);	0.30	144.08





Invoice No.: 1000142507
 File No. : 209375.010100
 Bill Date : November 9, 2022

Geoff Winkler
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208

Attn: Geoff Winkler

INVOICE

Re: SEC v. Beasley (Geoff Winkler, Receiver)

THIS INVOICE REPLACES 1000106463

	Total Fees:	\$	43,547.26
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Expenses:

Subpoenas	495.00	
Information and Research	457.20	

	Total Expenses:	\$	952.20
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	Current Invoice:	\$	44,499.46
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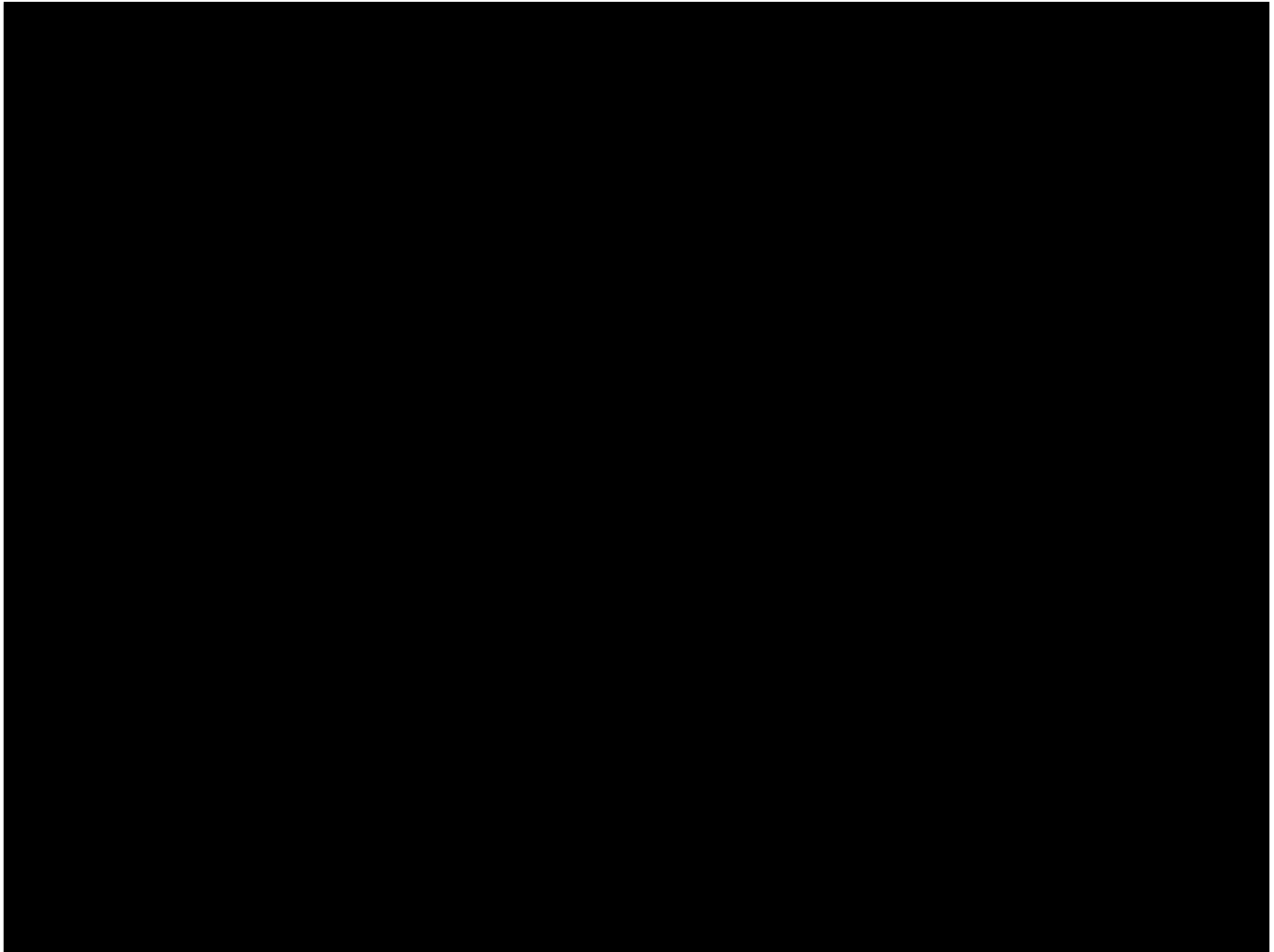
	Previous Balance (see attached statement):	\$	77,629.70
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	Total Amount Due:	\$	122,129.16
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KBH:LC
 Tax ID: 13-3613083

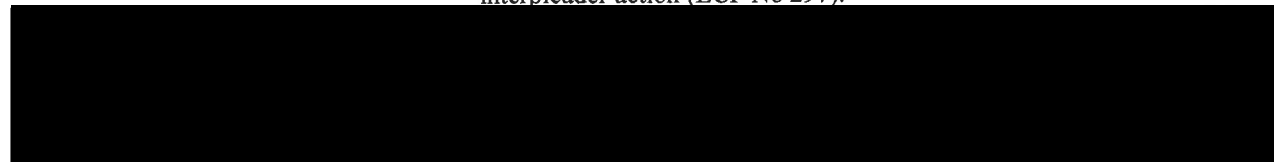
Invoice No.: 1000142507
 Matter No.: 209375.010100

Page 3

Description of Professional Services Rendered

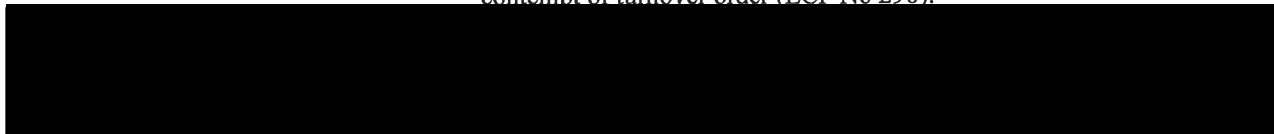
09/09/22	Jason Hicks	Review SEC's response to Kamille Dean (Judd atty) motion for leave to file interpleader (ECF No 278).	0.10	36.12
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09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply in support of her motion for leave to file an interpleader action (ECF No 297).	0.10	36.12
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09/09/22	Jason Hicks	Review omnibus brief in opposition to the various Kamille Dean (Judd) motions.	0.50	180.62
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09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply to motion to strike re order to show cause for contempt of turnover order (ECF No 296).	0.20	72.25
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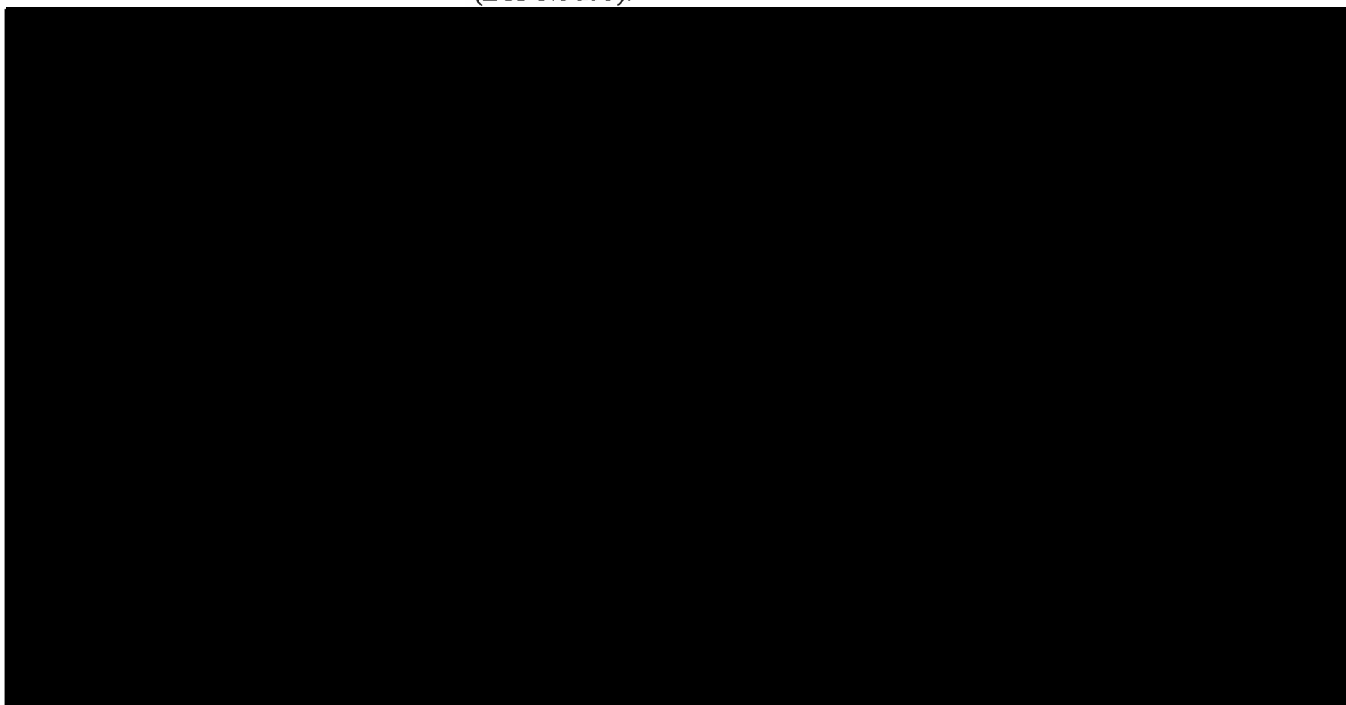
09/09/22	Jason Hicks	Review Kamille Dean (Judd atty) reply to	0.30	108.37
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Invoice No.: 1000142507
Matter No.: 209375.010100

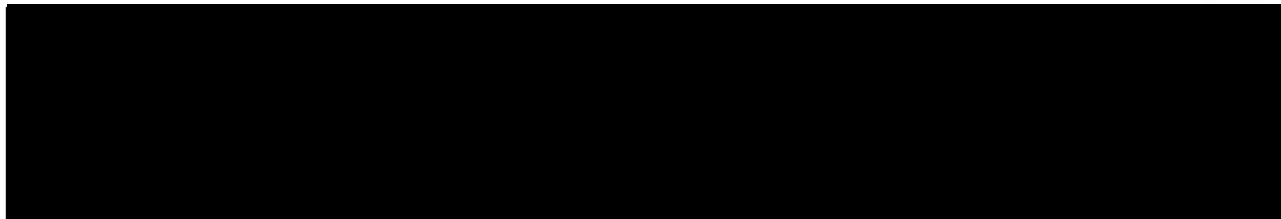
Page 4

Description of Professional Services Rendered

motion to quash jurisdiction and exhibits
(ECF No 295).



09/12/22	Kara B. Hendricks	Review and analysis of reply briefs filed on behalf of K. Dean (Reply in support of motion to quash, Reply in support of motion to strike, Reply in support of motion to file interpleader action) and follow-up with C. Spaulding regarding case law referenced.	0.70	336.18
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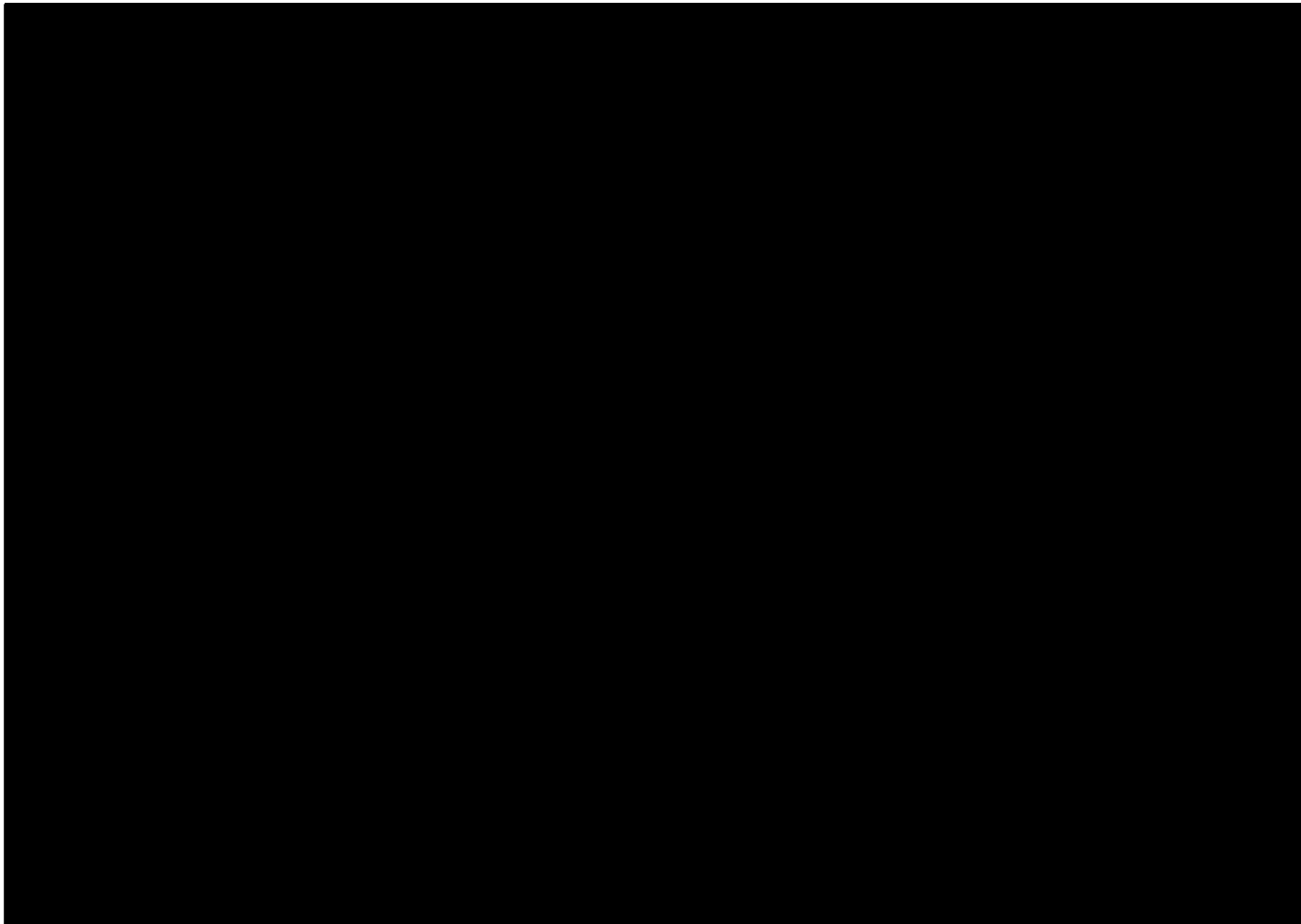


09/12/22	Christian Spaulding	Evaluate reply briefs filed by K. Dean and evaluate relevant case law to determine veracity of arguments made therein.	4.50	1,434.38
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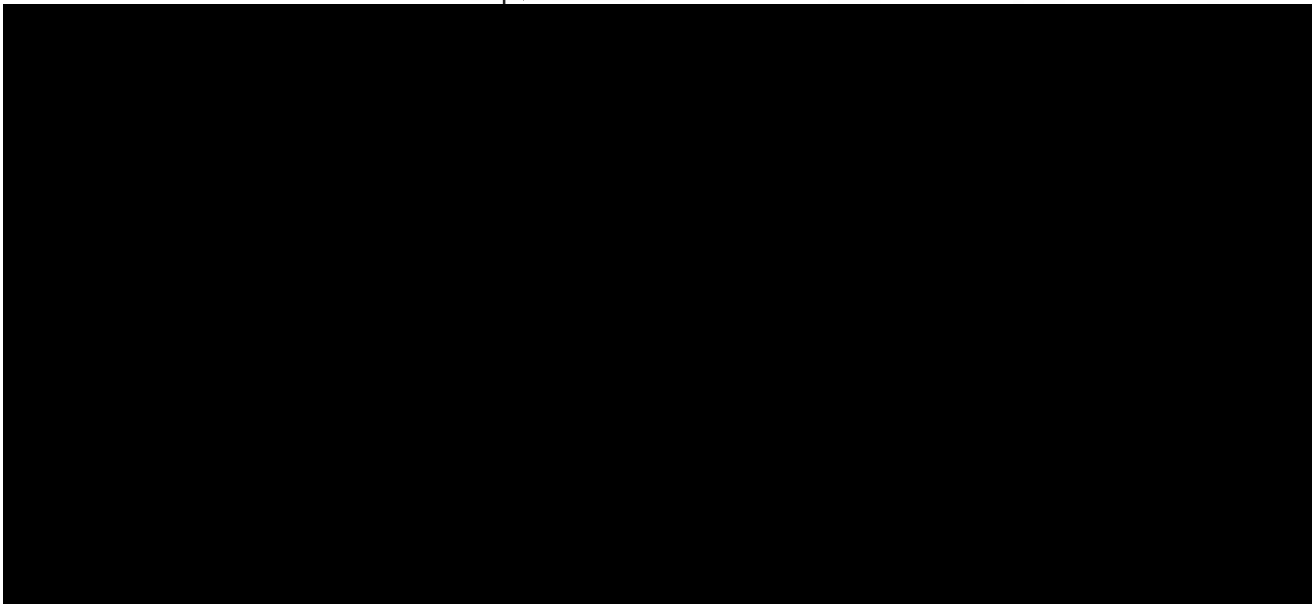


Invoice No.: 1000142507
Matter No.: 209375.010100

Description of Professional Services Rendered



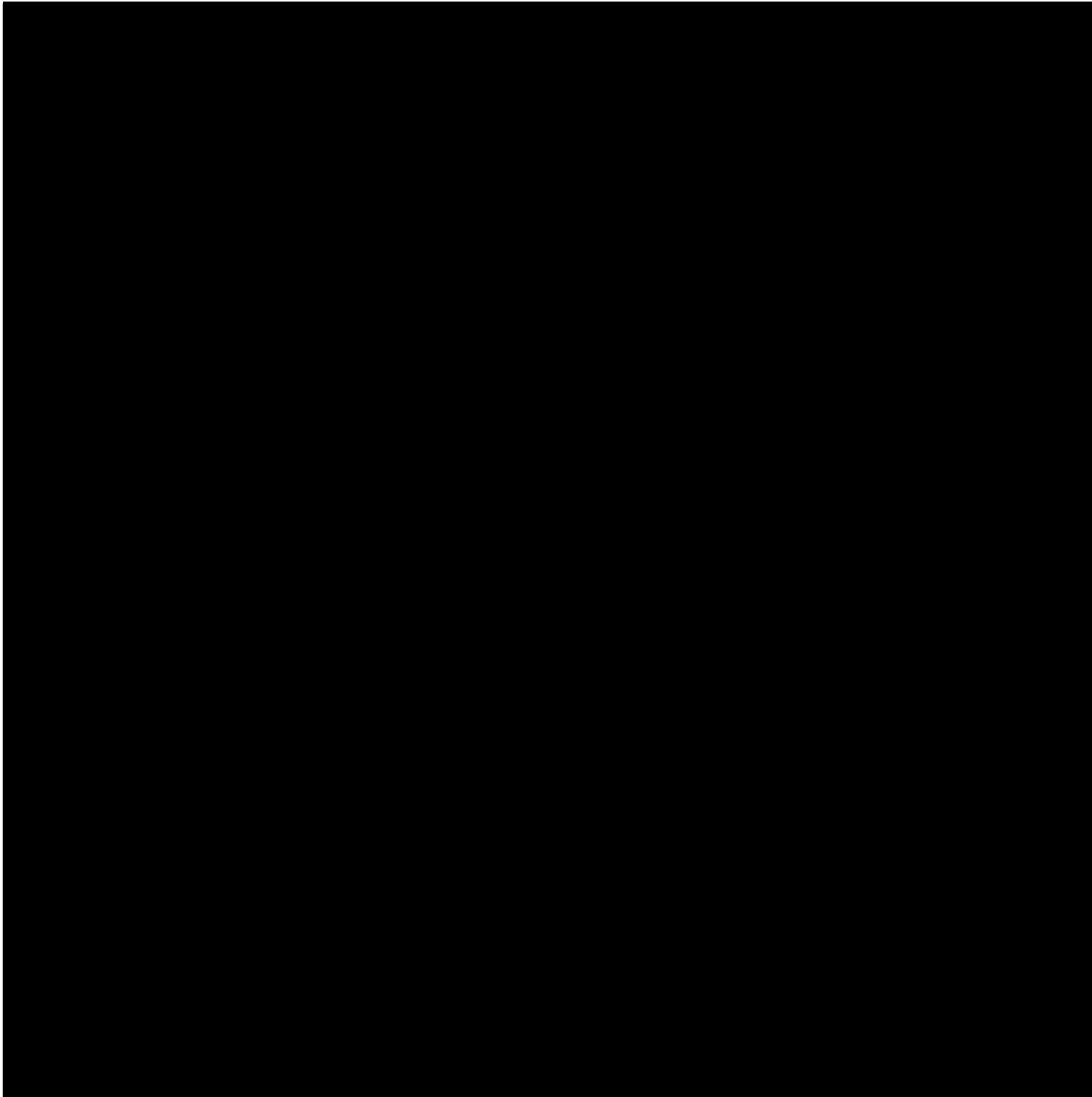
09/13/22	Kara B. Hendricks	Review analysis from C. Spaulding regarding cases discussed in reply briefs filed by K. Dean to understand potential impact of same.	0.20	96.05
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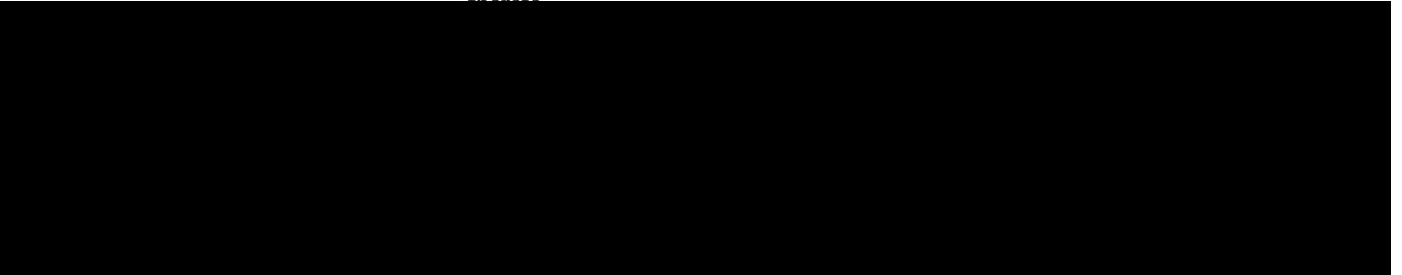
Invoice No.: 1000142507
Matter No.: 209375.010100

Page 6

Description of Professional Services Rendered



09/13/22	Christian Spaulding	Continue evaluation of cases cited in Dean Reply briefs and draft summary of arguments to be made in opposition	1.60	510.00
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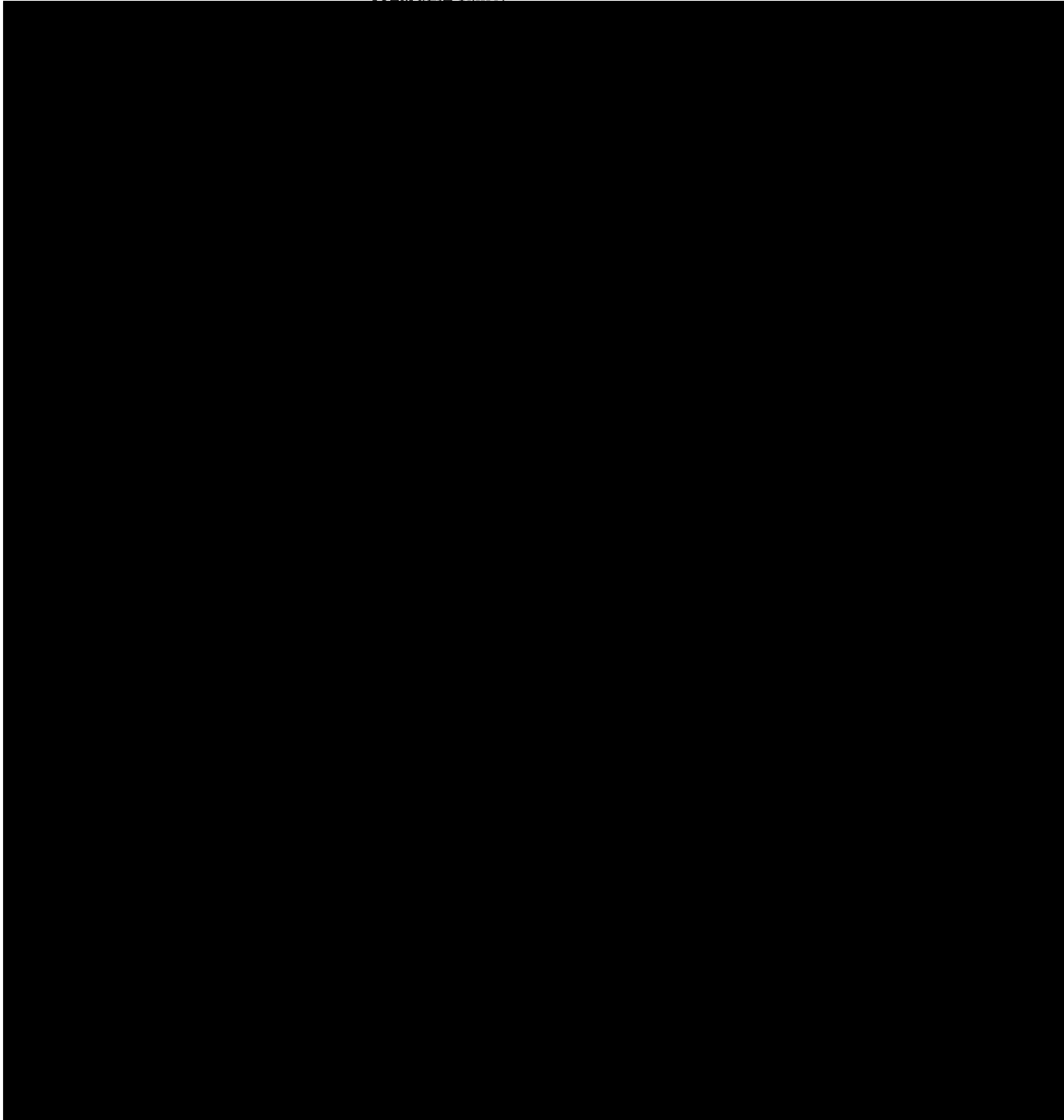
Invoice No.: 1000142507
Matter No.: 209375.010100

Page 17

Description of Professional Services Rendered

TASK CODE: GW004 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/02/22	Kara B. Hendricks	Review stipulation regarding K. Dean response and correspond with K. Hyson regarding same.	0.20	96.05



DATE PRINTED: 12/01/22 11:35
 BILL-THRU DATE: 12/01/22
 MATTER NO.: 209375.010100
 PREBILL . BA 12996441.KBD

PREBILL MEMO # 12996441

Matter Rate Level: 1

BILLING ADDRESS

Geoff Winkler

715 NW Hoyt Street, Suite 4364
 Portland, Oregon 97208
 Attn: Geoff Winkler

Bill Group: KBD0001

Bill Fmt: BKCYTASK_2

Billing Address should be changed to:

bkcytask with TK Summs for disc and

Matter Class:

FILE RESPONSIBILITIES

CLIENT - 209375

Winkler, Geoff

MATTER - 209375.010100 SEC v. Beasley (Geoff Winkler, Receiver)

Billing Atty: KBD Kara B. Hendricks
 Resp. Atty: KBD Kara B. Hendricks

INSTRUCTIONS TO ACCOUNTING:

GENERAL ACCOUNT INFORMATION

(through dates indicated)

Special Instructions: 7/29/2022 15% discount on fees for everyone EXCEPT Cynthia Ney. Cynthia Ney's rate is \$295. Make her discounted rate \$175 with no additional 15%. Give invoices to Kara Hendricks. Do not post until her approval. She will email the client - LC 7/11/22 - Per email from T. Kinsey, create matter plan - GWINKLER and tag it to this matter;lhn 10/3 Print in format BKCYTASK_2 - LC

	Rates at Stdard (Rate1) Valuation	Rates This File Discnts or Special Rates applied	
unbilled fees \$ thru 12/01/22	60,366.00	57,710.50	on account fees: \$ _____ 0.00 on account costs: \$ _____ 0.00
+	bill \$ _____		apply to bill: <input type="checkbox"/> yes \$ _____ <input type="checkbox"/> no apply to bill: <input type="checkbox"/> yes \$ _____ <input type="checkbox"/> no
unbilled costs \$ thru 12/01/22		0.00	unapplied balance: \$ _____ 0.00 retainer balance: \$ _____ 0.00
+	bill \$ _____		apply to bill: <input type="checkbox"/> yes \$ _____ <input type="checkbox"/> no apply to bill: <input type="checkbox"/> yes \$ _____ <input type="checkbox"/> no
regular A/R \$		263,448.59	
retainer A/R \$		0.00	
-			
moneys on hand		(0.00)	trust balance: \$ _____ 0.00 Send Outstanding Invoice Report?
=			

DATE PRINTED: 12/01/22 11:36
BILL-THRU DATE: 12/01/22
MATTER NO.: 209375.010100
PREBILL . BA 12996441.KBD

PAGE 18

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

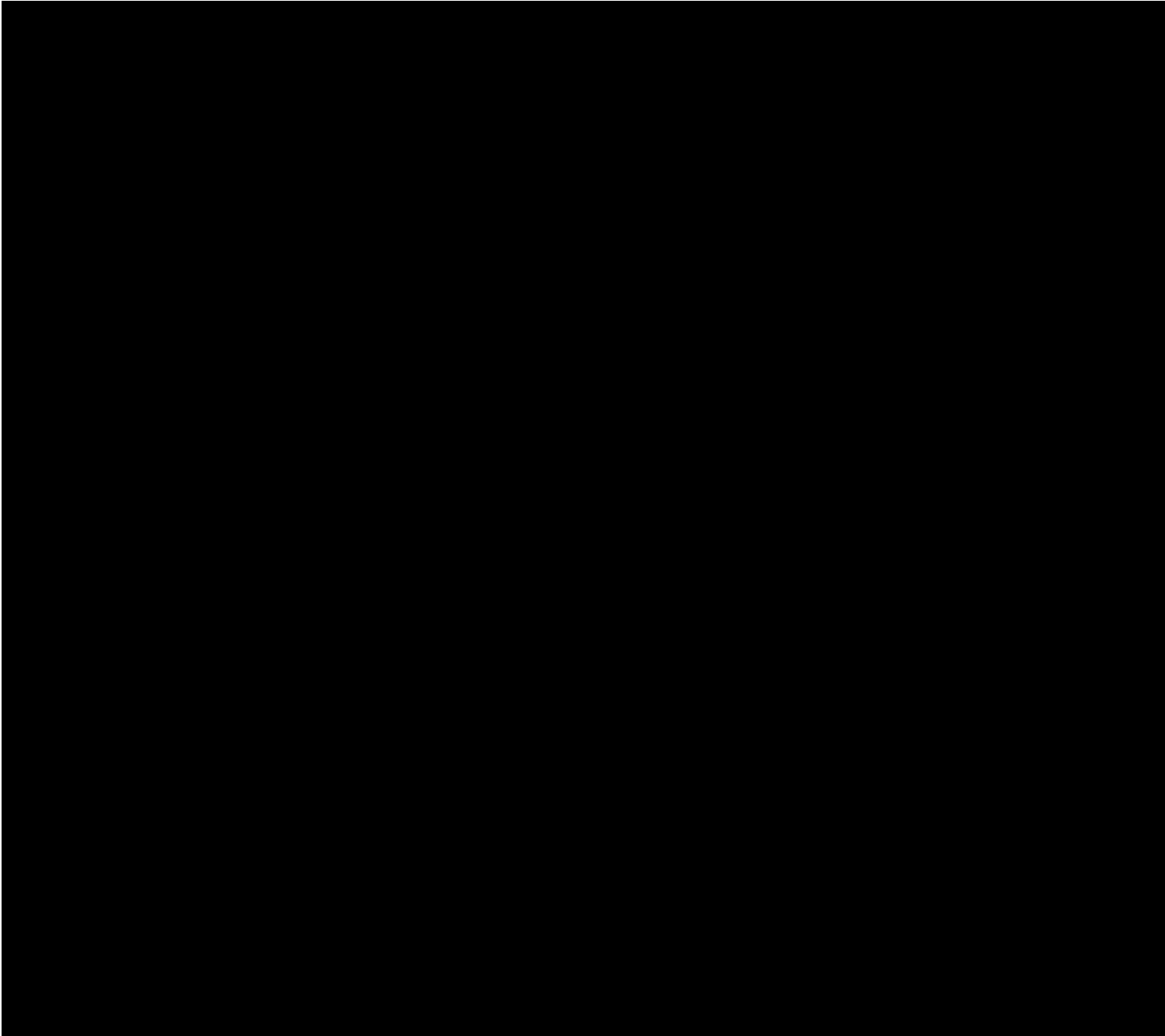
Winkler, Geoff

Billing Atty: Kara B. Hendricks

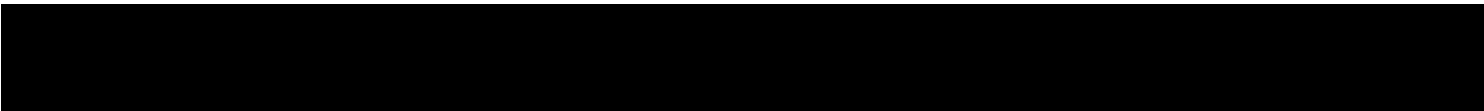
**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/17/22	KBH	0.30	565.00	565.00	169.50	Review order on K. Dean motion to compel and request C. Spaulding prepare memorandum of fees;	X	218425982
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DATE PRINTED: 12/01/22 11:36
 BILL-THRU DATE: 12/01/22
 MATTER NO.: 209375.010100
 PREBILL . BA 12996441.KBD

PAGE 21

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

Winkler, Geoff

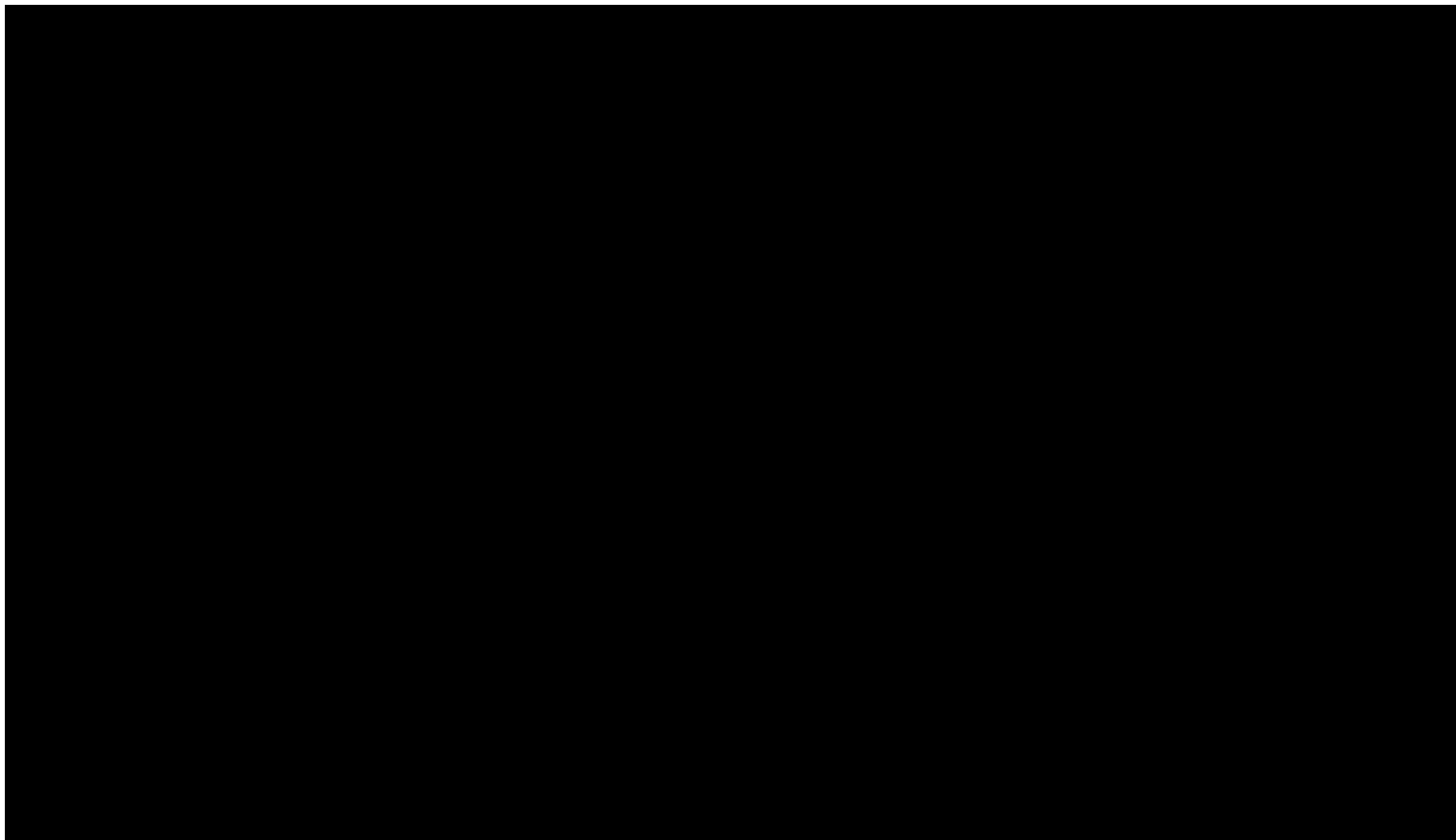
Billing Atty: Kara B. Hendricks

**MATTER -
209375.010100**

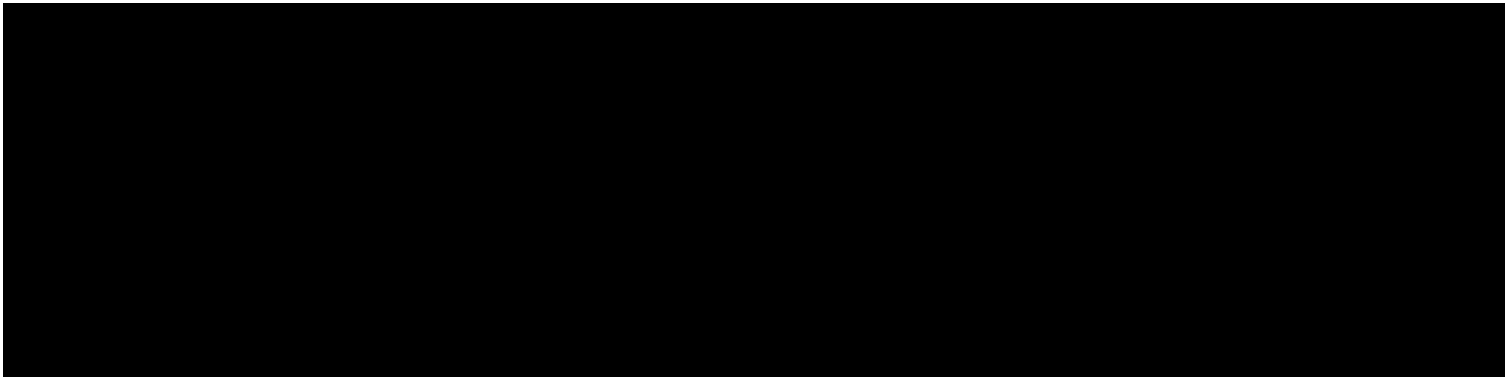
SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks

11/21/22	CS	2.50	375.00	375.00	937.50	Evaluate invoices and begin draft of Memorandum of Fees incurred in seeking to work with Kamille Dean and motions related to the same.	X	218495467
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11/22/22	KBH	0.30	565.00	565.00	169.50	Follow-up with C. Spaulding regarding memo for fees relating to Dean Motions and respond to inquiries regarding same;	X	218460123
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DATE PRINTED: 12/01/22 11:36
 BILL-THRU DATE: 12/01/22
 MATTER NO.: 209375.010100
 PREBILL . BA 12996441.KBD

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

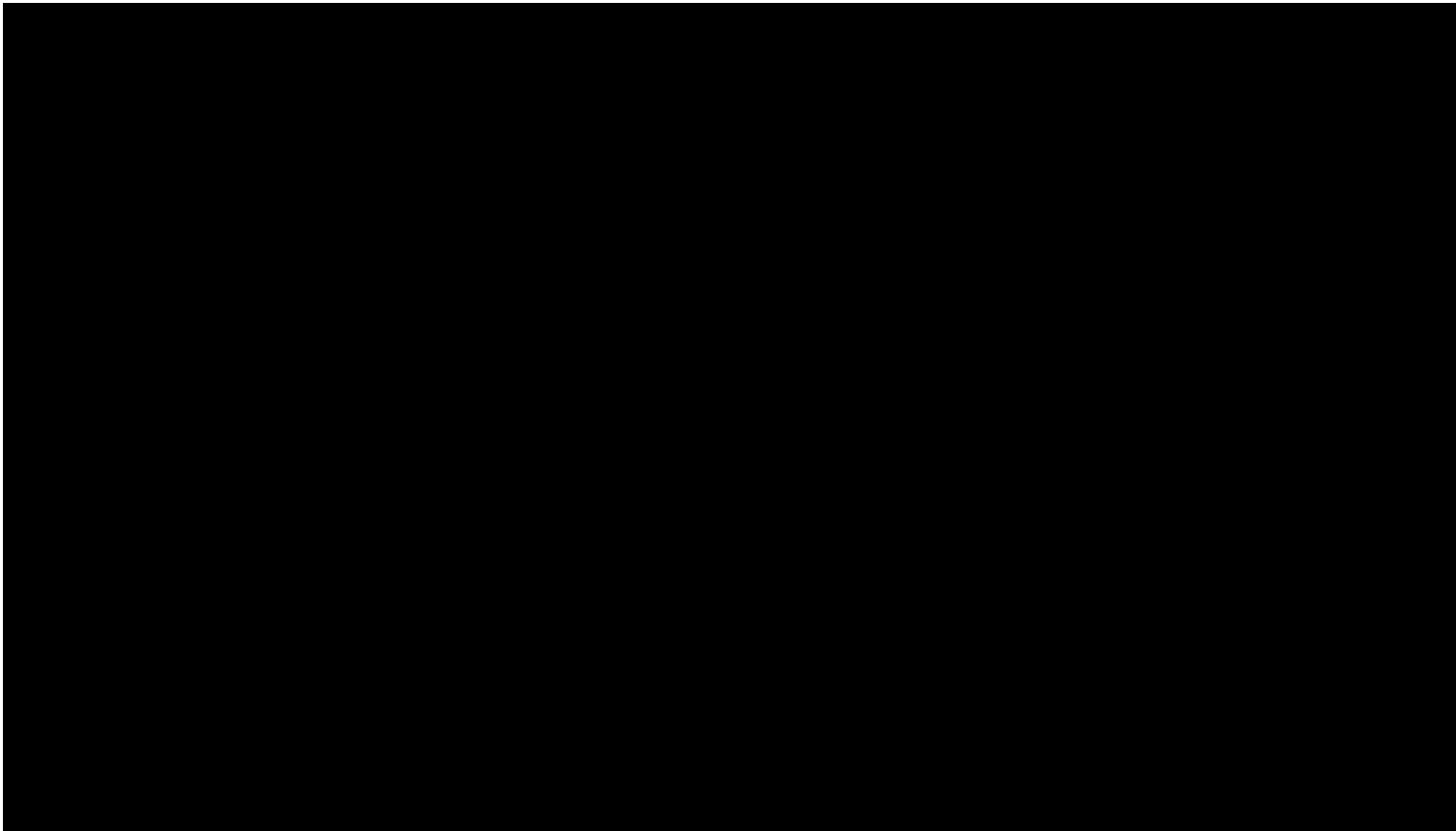
Winkler, Geoff

Billing Atty: Kara B. Hendricks

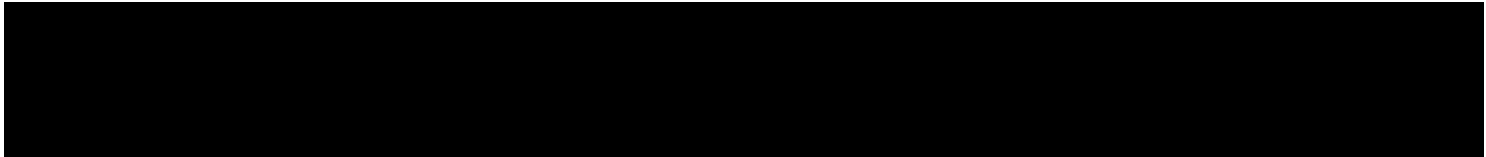
**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/23/22	CS	2.30	375.00	375.00	862.50	Evaluate relevant case law regarding reasonable fees awarded to receivers in similar cases for inclusion in Memorandum of Fees in Support of Receiver's Request for Attorneys' Fees Incurred with respect to Kamille Dean.	X	218495350
11/23/22	CS	2.40	375.00	375.00	900.00	Continue draft of Memorandum of Fees in Support of Request for Attorneys' Fees and Costs Incurred with respect to Kamille Dean.	X	218495391
11/25/22	CS	3.30	375.00	375.00	1,237.50	Continue draft of Memorandum of Fees related to efforts to recover funds from Kamille Dean and communications with team regarding the same.	X	218495383



DATE PRINTED: 12/01/22 11:36
BILL-THRU DATE: 12/01/22
MATTER NO.: 209375.010100
PREBILL . BA 12996441.KBD

PAGE 24

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

Winkler, Geoff

Billing Atty: Kara B. Hendricks

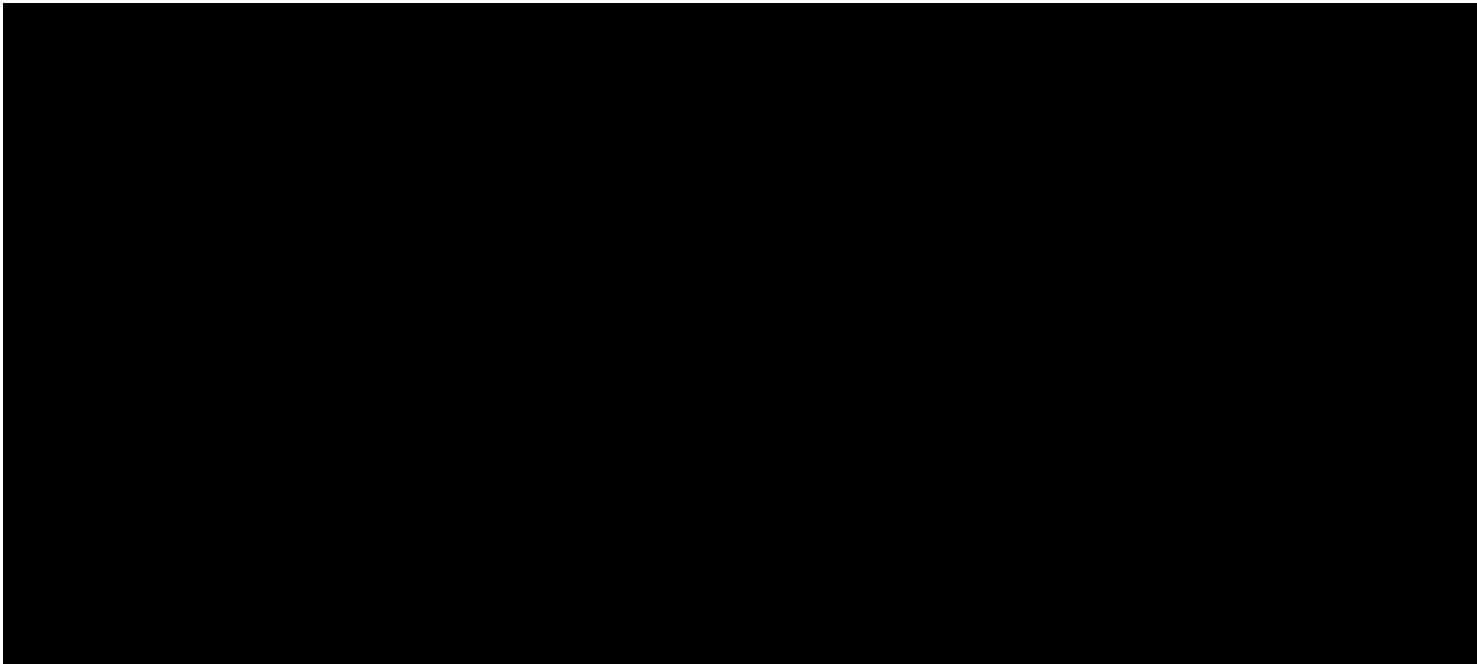
**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/28/22	KBH	0.10	565.00	565.00	56.50	Correspond with J. del Castillo regarding Dean fee recovery motion;	X	218513516
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DATE PRINTED: 12/01/22 11:36
BILL-THRU DATE: 12/01/22
MATTER NO.: 209375.010100
PREBILL . BA 12996441.KBD

PAGE 25

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

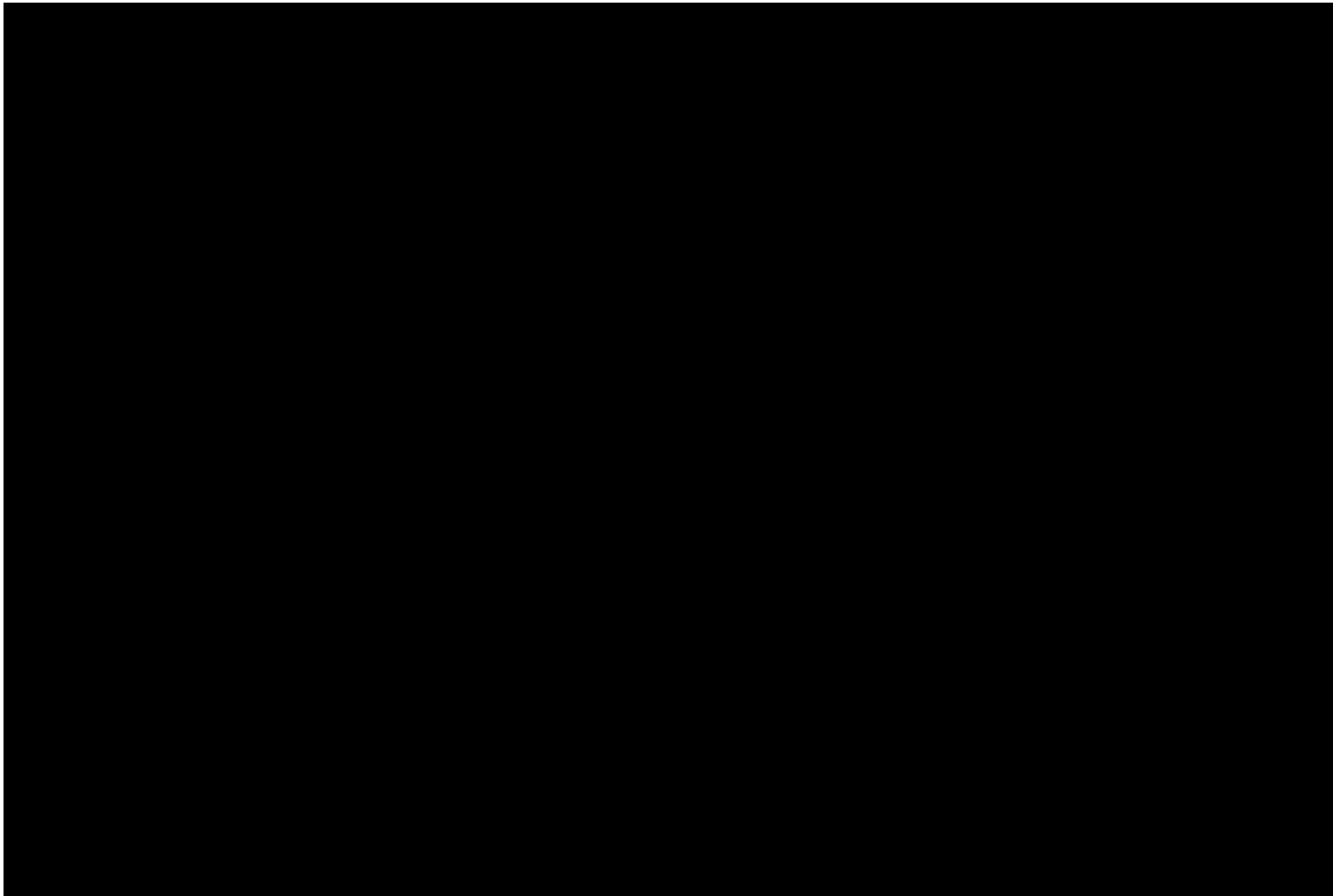
Winkler, Geoff

Billing Atty: Kara B. Hendricks

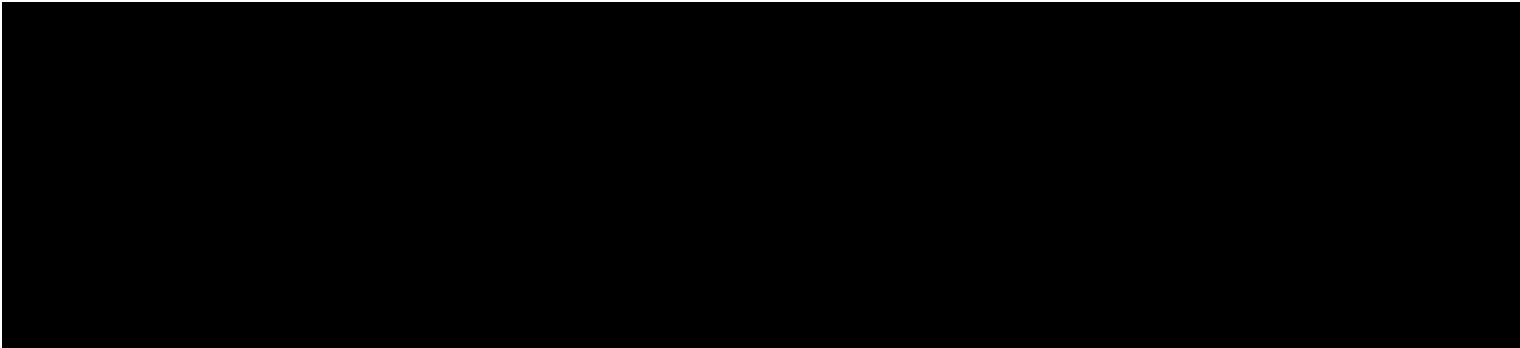
**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/29/22	KBH	0.10	565.00	565.00	56.50	Follow-up with J. del Castillo regarding information needed to finalize memo of fees related to Dean Motion to Compel (.1); Respond to C. Ney inquiries regarding exhibits and redactions needed for filing of same (.1);	X	218512569
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DATE PRINTED: 12/01/22 11:36
BILL-THRU DATE: 12/01/22
MATTER NO.: 209375.010100
PREBILL . BA 12996441.KBD

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

Winkler, Geoff

Billing Atty: Kara B. Hendricks

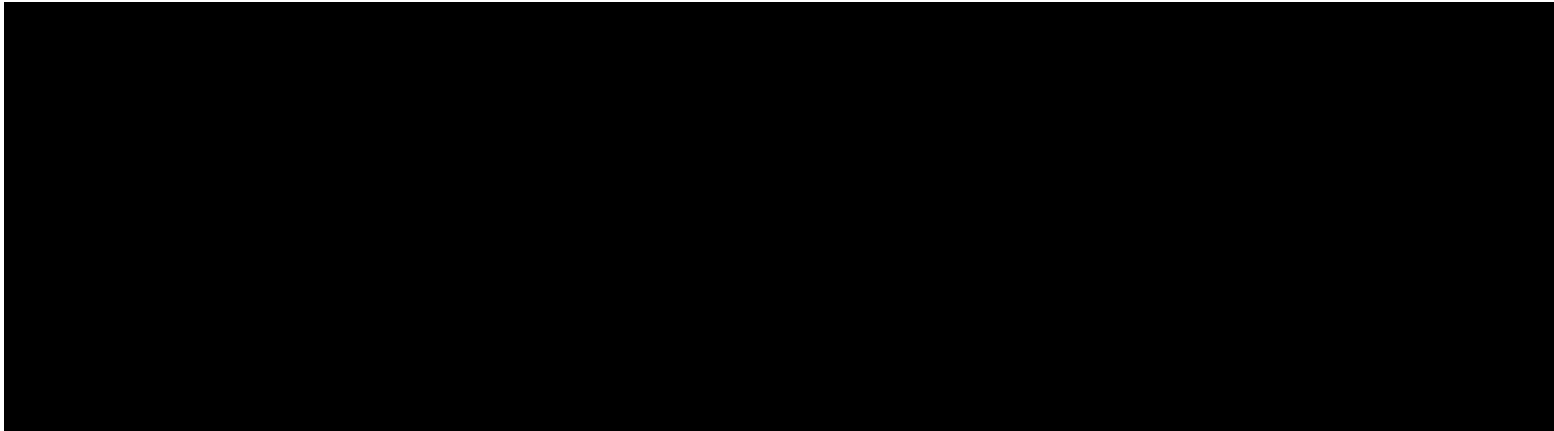
**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/29/22	CS	0.30	375.00	375.00	112.50	Confer with team regarding invoice entries demonstrating fees incurred in relation to Kamille Dean motion and compliance with Receivership Orders.	X	218495320
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DATE PRINTED: 12/01/22 11:36
 BILL-THRU DATE: 12/01/22
 MATTER NO.: 209375.010100
 PREBILL . BA 12996441.KBD

PAGE 28

PREBILL MEMO # 12996441

FILE RESPONSIBILITIES

CLIENT - 209375

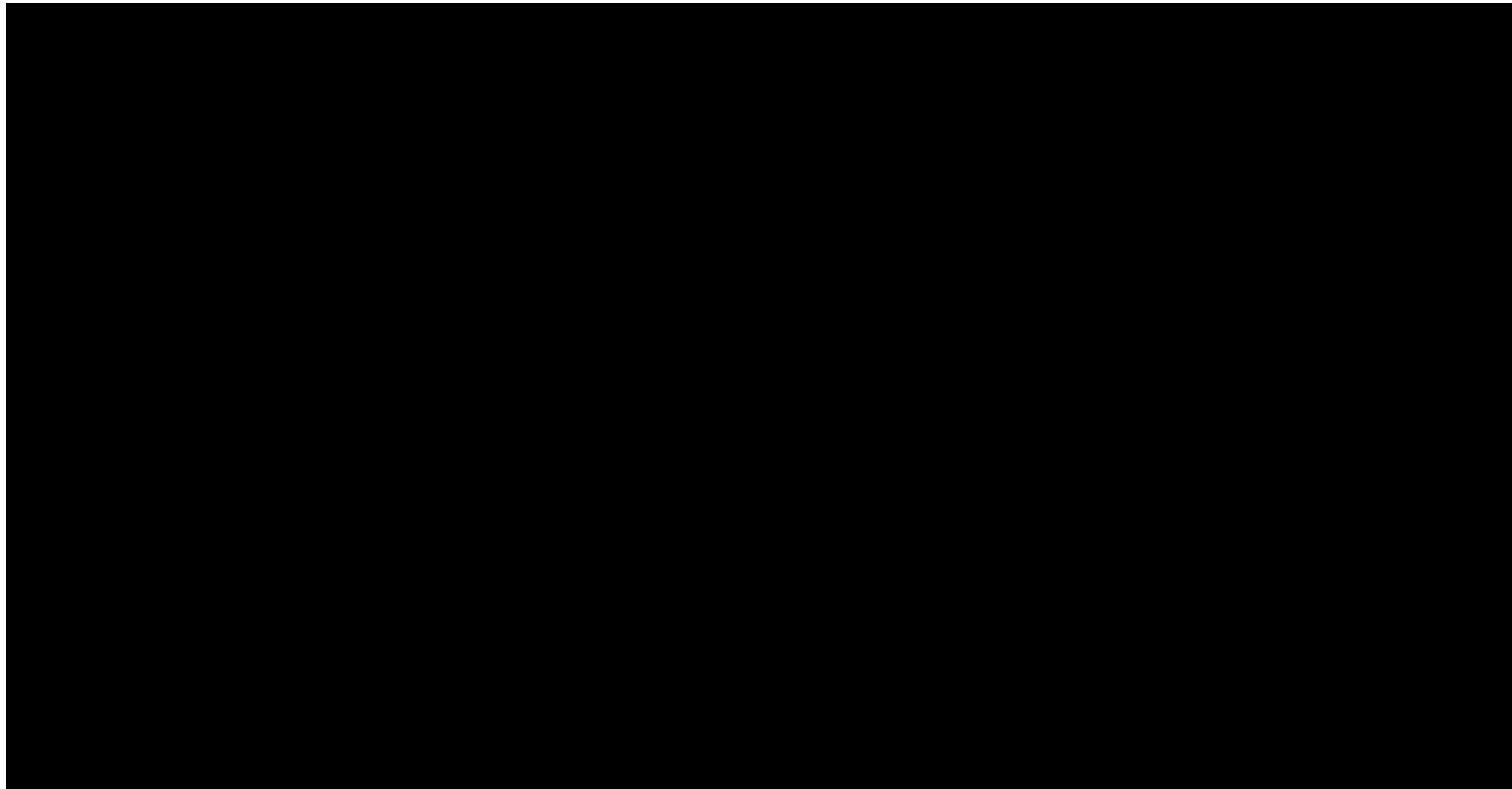
Winkler, Geoff

Billing Atty: Kara B. Hendricks

**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



11/30/22	CS	3.80	375.00	375.00	1,425.00	Revise draft of Memorandum of Fees related to recovery efforts directed to Kamille Dean to reflect information provided by Allen Matkins. Draft declarations of Kara Hendricks and Joshua A. del Castillo in support thereof.	X	218495510
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TOTAL HOURS: 131.60

TOTAL STANDARD DOLLAR VALUE: \$ 60,366.00

TOTAL MATTER DOLLAR VALUE: \$ 57,710.50

EXHIBIT 2

EXHIBIT 2

Declaration of Joshua A. del Castillo, Esq.

1 KARA B. HENDRICKS, ESQ.
 Nevada Bar No. 07743
 2 JASON K. HICKS, ESQ.
 Nevada Bar No. 13149
 3 KYLE A. EWING, ESQ.
 Nevada Bar No. 014051
 4 **GREENBERG TRAUIG, LLP**
 10845 Griffith Peak Drive, Suite 600
 5 Las Vegas, Nevada 89135
 Telephone: (702) 792-3773
 6 Facsimile: (702) 792-9002
 7 Email: hendricksk@gtlaw.com
hicksja@gtlaw.com
 8 ewingk@gtlaw.com

9 *Attorneys for Geoff Winkler, Receiver for*
J&J Consulting Services, Inc., J&J Consulting Services, Inc.,
 10 *J and J Purchasing LLC, The Judd Irrevocable Trust,*
and BJ Holdings LLC

11
 12 **IN THE UNITED STATES DISTRICT COURT**
 13 **FOR THE DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE COMMISSION,
 15
 16
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 20
 21
 22
 23
 24
 25
 26
 27
 28
 Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY LAW
 GROUP PC; JEFFREY J. JUDD; CHRISTOPHER
 R. HUMPHRIES; J&J CONSULTING SERVICES,
 INC., an Alaska Corporation; J&J CONSULTING
 SERVICE, INC., a Nevada Corporation; J AND J
 PURCHASING LLC; SHANE M. JAGER; JASON
 M. JONGEWARD; DENNY SEYBERT; and
 ROLAND TANNER,

Defendants,

THE JUDD IRREVOCABLE TRUST; PAJ
 CONSULTING INC; BJ HOLDINGS LLC;
 STIRLING CONSULTING, LLC.; CJ
 INVESTMENTS, LLC; ROCKING HORSE
 PROPERTIES, LLC; TRIPLE THREAT
 BASKETBALL, LLC; ACAC LLC; ANTHONY
 MICHAEL ALBERTO, JR., and MONTY CREW
 LLC;

Relief Defendants.

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

**DECLARATION OF JOSHUA A. DEL
 CASTILLO IN SUPPORT OF
 MEMORANDUM OF FEES AND
 COSTS RELATING TO MOTION TO
 COMPEL OR ALTERNATIVE
 MOTION TO SHOW CAUSE WHY
 KAMILLE DEAN SHOULD NOT BE
 HELD IN CONTEMPT FOR FAILURE
 TO COMPLY WITH THIS COURT'S
 ORDER**

I, JOSHUA DEL CASTILLO, declare as follows:

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1. I am an attorney at the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”), counsel of record for Geoff Winkler (the “Receiver”), the Court-appointed receiver in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Allen Matkins was retained by the Receiver in June 2022.

3. I understand that the Receiver selected Allen Matkins as one of two firms serving as general receivership counsel due to the firm's decades-long experience and expertise in federal equity receivership matters, as well as in creditors' rights, litigation, and personal and real property disposition matters.

4. Allen Matkins has served as counsel to federal equity receivers in dozens of cases, has represented a variety of constituents in hundreds of bankruptcy matters, and has significant substantive experience in related areas, such as securities, corporate, and real estate.

5. With respect to the instant matter, two Allen Matkins attorneys devoted time to the matter presently before the Court, myself (Joshua del Castillo) and my partner, David Zaro.

6. I am a bankruptcy and creditors’ rights litigation partner at Allen Matkins, with over a decade of experience representing federal equity, and state court, receivers.

7. Mr. Zaro is the head of Allen Matkins’ receiverships practice, and likewise a bankruptcy and creditors’ rights litigation partner, with decades of experience representing both federal and state-court receivers.

8. As it relates to the Receiver’s efforts to recover receivership funds held by attorney Kamille Dean, Allen Matkins worked with its co-counsel, Greenberg Traurig, to resolve this dispute without judicial intervention and, when such a resolution was no longer feasible, Allen Matkins collaborated with Greenberg Traurig in evaluating, researching, and drafting the Receiver's Motion to Compel and related documents.

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1 9. Allen Matkins incurred at least \$7,957.00 in reasonable and necessary fees and costs in
2 connection with seeking Ms. Dean's cooperation with this Court's order, inclusive of efforts to resolve
3 the dispute without judicial intervention.

4 10. Inclusive of the Receiver's efforts to recover the funds held by Ms. Dean prior to the filing
5 of the Motion to Compel, Allen Matkins spent at least 14.6 hours in attorney time working to recover the
6 funds at issue.

7 11. The time spent included, among other things, communications with Ms. Dean;
8 collaboration with co-counsel regarding strategy and efforts to recover the funds at issue; and evaluation,
9 analysis, and communications regarding the Motion to Compel, Ms. Dean's filings and related filings.

10 12. I understand and believe That the Receiver's efforts to obtain Ms. Dean's compliance with
11 the order of this Court began shortly after his appointment in July, 2022 and continued through September
12 2022.

13 13. I understand and believe that, through early communications, Ms. Dean indicated that she
14 would file a motion with the Court seeking to retain the funds in dispute.

15 14. I understand and believe that, Ms. Dean never followed through with her proposed plan,
16 forcing the Receiver to file the Motion to Compel.

17 15. Based on my review of the Court's docket, I understand and believe that, rather than filing
18 a response to the Motion to Compel, Ms. Dean submitted four separate filings to which the Receiver
19 prepared an omnibus response, which response Allen Matkins assisted in preparing.

20 16. I understand and believe that Ms. Dean's decision to submit multiple filings in response to
21 the Motion to Compel increased the amount of time spent by the Receiver on this matter substantially.

22 17. Allen Matkins endeavored to resolve this matter as efficiently as possible.

23 18. In so doing, myself and David Zaro allocated at least 14.6 hours of work to this matter,
24 inclusive of efforts prior to the filing of the Motion to Compel.

25 19. As demonstrated through the attached billing entries, Allen Matkins efficiently staffed and
26 expended a reasonable amount of hours to this matter.

27 20. Given the foregoing and in light of the circumstances giving rise to this matter, I
28 respectfully submit that the 14.6 hours spent by Allen Matkins were reasonable and appropriate.

1 21. Attached to his declaration as **Exhibit A** are true and correct copies of the billing entries
2 related to Allen Matkins' efforts in recovering the Receivership funds held by Ms. Dean.

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

4 Executed on December 1, 2022.

/s/ Joshua A. del Castillo

JOSHUA A. DEL CASTILLO

Declarant

GREENBERG TRAUERIG,
LLP
10845 Griffith Peak

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EXHIBIT A

EXHIBIT A

Billing Entries related to Allen Matkins

11/28/22 12:29:00 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Preliminary Billing FormBilling Atty: 001842 - Del Castillo,
Joshua

Matter #: 392775.00003

Client Name: Winkler, Geoff - Receiver for J&J Consul

Date of Last Billing: 09/27/22

Matter Name: Asset Recovery & Management

Proforma Number: 1190002

Client/Matter Joint Group # 392775.1

Client Matter Number:

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/05/22	9039013	several email communications as to attorney turnover issues, including with Ms. Dean and counsel (.6)	Zaro, David	0.60	327.00	327.00	WO	HD	TR	_____
07/06/22	9039016	Several emails with Receiver counsel related to attorney turnover of account funds, including Ms. Dean (.5).	Zaro, David	0.50	272.50	599.50	WO	HD	TR	_____
07/07/22	9039018	Call with Ms. Dean related to the turnover demand and next steps (.3). Emails with counsel and follow-up call related to the turnover of balance in account and Receiver's letter (.6).	Zaro, David	0.90	490.50	1,090.00	WO	HD	TR	_____
07/19/22	8902255	Several emails related to the turnover demands, Dean email and follow-up.	Zaro, David	0.40	218.00	1,308.00	WO	HD	TR	_____
07/29/22	8915687	Evaluate emails, assess communications with Ms. Dean and the draft outline of declaration, email to counsel.	Zaro, David	0.60	327.00	1,635.00	WO	HD	TR	_____
08/01/22	9039019	Analysis/review/revise draft motion to compel turnover and Zaro declaration (.8).	Zaro, David	0.80	436.00	2,071.00	WO	HD	TR	_____

11/28/22 12:29:00 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/16/22	8930483	Evaluate emails/analyze filings: briefs and exhibits from Ms. Dean related to the turnover of funds in her account from Judd (1.2). Attend call with Receiver and counsel as to turnover motion and counter motion/Receiver response (.5).	Zaro, David	1.70	926.50	2,997.50	WO	HD	TR	_____
08/16/22	9039021	Review K. Dean motions regarding turnover of Judd funds and emails with Receiver and co-counsel regarding same (1.1); legal analysis of baseless arguments presented by K. Dean (1.2); teleconference with co-counsel regarding preparation of response to same and prepare and transmit notes and initial draft briefing for incorporation into response (2.9).	Del Castillo, Joshua	5.20	2,834.00	5,831.50	WO	HD	TR	_____
08/24/22	8953820	Evaluate issues and several e mails related to the Dean briefs and Receiver's response, accounting, advice to counsel as to approach.	Zaro, David	0.70	381.50	6,213.00	WO	HD	TR	_____
08/24/22	9039022	Review and respond to correspondence from K. Hendricks and Receiver regarding response to K. Dean motions and associated accounting (0.2)	Del Castillo, Joshua	0.20	109.00	6,322.00	WO	HD	TR	_____
08/26/22	9039023	Review and prepare recommended revisions to draft Omnibus Opposition to K. Dean motions regarding retention of receivership funds (1.1)	Del Castillo, Joshua	1.10	599.50	6,921.50	WO	HD	TR	_____
08/30/22	8953923	Evaluate issues concerning outstanding recovery of fees, turnovers and several emails as to Dean's pending motions.	Zaro, David	0.40	218.00	7,139.50	WO	HD	TR	_____

11/28/22 12:29:00 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Fees for Matter 392775.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/09/22	8956992	Review responses from atty K. Dean to Receiver's Oppositions to various motions and prepare correspondence to receivership team regarding same (0.9).	Del Castillo, Joshua	0.90	490.50	7,630.00	WO	HD TR
09/09/22	8959898	Analysis/advice to Receiver concerning the attorney's fees recovery including the Dean brief, California legal issues and follow-up.	Zaro, David	0.60	327.00	7,957.00	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	7.20	545.00	3,924.00
001842	Del Castillo, Joshua	7.40	545.00	4,033.00
				\$7,957.00
Subtotal Fees				\$7,957.00
Discount				0.00
Total Fees				7,957.00
Total Disbursements				0.00

Attorney Billing Instructions

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|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL | <input type="checkbox"/> Hold |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

Billing Instructions

expires 6/30/2023: Partners @ 545; Assoc @ 445; Paralegals @ 350

Account Summary – As Of 11/28/22

Fiscal YTD		Calendar YTD			LTD	
Total	Fees	Disb.	Total	Fees	Disb.	Disbursements

11/28/22 12:29:00 PROFORMA STATEMENT FOR MATTER 392775.00003 (Winkler, Geoff - Receiver for J&J Consul) (Asset Recovery & Management)

Worked	122,893.00	122,893.00	0.00	147,462.00	147,462.00	0.00	147,462.00	147,462.00	0.00
Unbilled Adj	0.00	0.00	0.00	2,628.57	2,628.57	0.00	2,628.57	2,628.57	0.00
Billed	22,053.57	22,053.57	0.00	22,053.57	22,053.57	0.00	22,053.57	22,053.57	0.00
Collected	22,053.57	22,053.57	0.00	22,053.57	22,053.57	0.00	22,053.57	22,053.57	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	122,893.00	122,893.00	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Winkler, Geoff - Receiver for J&J Consulting Services, Inc.; J and J Purchasing
 LLC; The Judd Irrevocable Trust; BJ Holdings LLC
 Geoff B. Winkler
 American Fiduciary Services LLC
 715 NW Hoyt Street, Suite 4364
 Portland, OR 97208
