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Attorneys for Geoff Winkler Receiver

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.
19

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

**NOTICE OF COMPLIANCE WITH
THE COURT’S JANUARY 25, 2023,
MINUTE ORDER (ECF No. 439)**

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21 Geoff Winkler, the Court-appointed Receiver (the “Receiver”), submits this Notice of
22 Compliance with the Court’s January 25, 2023, Minute Order (ECF No. 439).

23 On January 24, 2023, the Receiver submitted a stipulation and order, *see* ECF No. 438,
24 authorizing defendant Matt Beasley to transfer ownership of certain real properties (the “SAO”).
25 In a Minute Order, the Court noted that Mr. Beasley had made interlineations on page 3 of the
26 document, which were not expressly acknowledged by a representative of the other parties to the
27 SAO. *See* ECF No. 439. The Court directed counsel “to initial the interlineations on page 3, if
28 amenable to them.” *Id.* Further, “[c]ounsel must then file the amended stipulation ...” *Id.*

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1 The undersigned certifies that the Receiver has complied with the Minute Order.
2 Specifically, on January 25, 2023, counsel for the Receiver obtained the Receiver’s initials to the
3 interlineations. On January 25, 2023, counsel for the Receiver obtained counsel for the SEC’s
4 initials to the interlineations. Also on January 25, 2023, the undersigned initialed the
5 interlineations. A scanned reproduction of the fully initialed amended SAO was filed on
6 January 25, 2023. (See ECF No. 440).

7 For the avoidance of doubt, the undersigned further certifies that all parties or their
8 representatives had been provided the interlineated version of the SAO containing Mr. Beasley’s
9 alterations *prior to* the undersigned firm submitting the stipulation and obtaining approval for
10 affixing the electronic signature of counsel for the SEC and Ms. Hendricks, counsel for the
11 Receiver. Stated differently, the Receiver and his counsel did not submit the SAO without
12 approval for the interlineations. Because Mr. Beasley dated neither his signature nor his initialed
13 alteration, however, it was not clear if the alterations were made before or after the remaining
14 signatures were affixed, and the Receiver appreciates the Court’s concern regarding
15 acknowledgements of Mr. Beasley’s alterations. Accordingly, the Receiver submitted the
16 amended SAO as promptly as possible.

17 DATED this 25th day of January, 2023.

GREENBERG TRAUIG, LLP

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19 By: */s/ Kara B. Hendricks*
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CERTIFICATE OF SERVICE

1 I hereby certify that, on the 25th day of January 2023, a true and correct copy of the
2 foregoing **NOTICE OF COMPLIANCE WITH THE COURT’S JANUARY 25, 2023,**
3 **MINUTE ORDER (ECF No. 439)** was filed electronically via the Court’s CM/ECF system.
4 Notice of filing will be served on all parties by operation of the Court’s CM/ECF system, and
5 parties may access this filing through the Court’s CM./ECF system.
6

7 */s/ Evelyn Escobar-Gaddi*
8 _____
9 An employee of GREENBERG TRAUIG, LLP
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