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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 RESPONSE TO
NON-PARTY KAMILLE DEAN’S
OBJECTIONS FROM MAGISTRATE
JUDGE’S ORDERS [ECF Nos. 380, 423]
PURSUANT TO ORDER AFFIRMING
MAGISTRATE JUDGE’S ORDERS
[ECF No. 473]**

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 Response to Non-
23 Party Kamille Dean’s Objections From Magistrate Orders [ECF Nos. 380, 423] Pursuant to Order
24 Affirming Magistrate Judge’s Order [ECF No. 473] (the “Memorandum of Fees”).

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1 This Memorandum of Fees is based on the below Points and Authorities, the declaration
2 attached hereto, the Court’s order dated March 1, 2023 (ECF No. 473), the pleadings and papers
3 on file herein, and such other and further information as may be presented to the Court at the time
4 of any hearing.

5 DATED this 10TH day of March, 2023.

6 **GREENBERG TRAUIG, LLP**

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

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13 *Attorneys for Receiver Geoff Winkler*

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. FACTUAL BACKGROUND**

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

28 ¹ ECF No. 56.

² ECF No. 210.

³ ECF No. 368.

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1 Relating to the Motion to Compel.⁴ The same day, Ms. Dean submitted her first objection to the
2 Magistrate’s November 17, 2022 Order Granting the Receiver’s Motion to Compel (the “Objection
3 to the Order Granting Motion to Compel”).⁵ On December 15, 2022, the Receiver submitted his
4 Response to Ms. Dean’s Objection to the Order Granting Motion to Compel.⁶

5 On December 29, 2022, this Court entered an order granting the Receiver’s Memorandum
6 of Fees and Costs in which the Court awarded the Receiver fees in the amount of \$33,755.21 and
7 ordered Ms. Dean to make payment to the Receiver within 30 days unless an objection is filed (the
8 “Fee Order”).⁷ On January 12, 2023, Ms. Dean filed her Objection, Request for De Novo Review,
9 and Appeal From Magistrate’s 12-29-22 Order (the “Objection to the Fee Order”).⁸ The Receiver
10 filed his response to Ms. Dean’s Objection to the Fee Order on January 26, 2023, in which the
11 Receiver argued Ms. Dean’s Objection failed to meet the requisite legal standard and demonstrated
12 a willful and intentional waste of judicial and receivership resources.⁹ On March 1, 2023, this
13 Court entered an Order Affirming Magistrate Judge’s Orders in which the Court denied
14 Ms. Dean’s objection to the magistrate’s December 29, 2022, order and also denied Ms. Dean’s
15 objection to the magistrate’s order granting the Receiver’s Motion to Compel (the “March 1
16 Order”).¹⁰ In affirming the Magistrate Judge’s Orders, the Court agreed that Ms. Dean’s objection
17 demonstrated (another) “willful and intentional waste of judicial and receivership resources.”¹¹
18 As a result, the Court granted the Receiver’s request for additional attorney’s fees incurred in
19 responding to Ms. Dean’s objections and ordered the Receiver to submit a memorandum of fees
20 and costs associated therewith.¹² As such, the instant Memorandum of Fees demonstrates the fees
21 and costs incurred by the Receiver with respect to this matter and establishes the propriety of the
22 Receiver’s request.

23 ⁴ ECF No. 378.

24 ⁵ ECF No. 380.

25 ⁶ ECF No. 391.

26 ⁷ ECF No. 417.

27 ⁸ ECF No. 423.

28 ⁹ ECF No. 443.

¹⁰ ECF No. 473.

¹¹ *Id.*

¹² *Id.* at p. 7.

1 **II. FEES REQUESTED**

2 As demonstrated below and through the attached documentation, the Receiver allocated 81
3 hours and incurred \$28,872.13 in fees responding to Ms. Dean’s Objections and therefore requests
4 an order directing payment of the same.¹³

5 **A. The Receiver Requests Fees in the Amount of \$32,803.61**

6 An award of reasonable attorney’s fees is based on the “lodestar” calculation set forth in
7 *Hensley v. Eckerhart*, 461 U.S. 424, 433, 103 S. Ct. 1933 (1983). *Nev. Prop. I v. Kiwibank Ltd.*,
8 2020 U.S. Dist. LEXIS 172862, *6-7 (D. Nev. Sept. 21, 2020) (citing *Fischer v. SJB-P.D., Inc.*,
9 214 F.3d 1115, 1119 (9th Cir. 2000) (applying *Hensley*)). The Court “must first determine a
10 reasonable fee by multiplying ‘the number of hours reasonably expended on the litigation’ by ‘a
11 reasonable hourly rate.’” *Nev. Prop. I*, 2020 U.S. Dist. LEXIS 172862, 6-7 (quoting *Hensley*, 461
12 U.S. at 433). Next, the Court “must decide whether to adjust the lodestar calculation based on an
13 evaluation of the factors articulated in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir.
14 1975), which have not been subsumed into the lodestar calculation.” *Nev. Prop. I*, 2020 U.S.
15 Dist. LEXIS 172862, 6-7 (citing *Fischer*, 214 F.3d at 1110 (internal citations omitted). The *Kerr*
16 factors are:

17 (1) the time and labor required, (2) the novelty and difficulty of the questions
18 involved, (3) the skill requisite to perform the legal service properly, (4) the
19 preclusion of other employment by the attorney due to acceptance of the case,
20 (5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations
21 imposed by the client or the circumstances, (8) the amount involved and the results
22 obtained, (9) the experience, reputation, and ability of the attorneys, (10) the
“undesirability” of the case, (11) the nature and length of the professional
relationship with the client, and (12) awards in similar cases.

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

24 “Once calculated, the lodestar is presumptively reasonable.” *Nev. Prop. I*, 2020 U.S. Dist.
25 LEXIS 172862, *6-7 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*,
26 483 U.S. 711, 728, 107 S. Ct. 3078 (1987)). “Only in ‘rare and exceptional cases’ should a court

27 _____
28 ¹³ 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 adjust the lodestar figure.” *Id.* (quoting *Van Gerwen v. Guar. Mut. Life Co.*, 214 F.3d 1041, 1045
 2 (9th Cir. 2000) (internal citations omitted) and citing *Fischer*, 214 F.3d at 1119 n. 4 (stating that
 3 the lodestar figure should be adjusted only in rare and exceptional cases)).

4 In total, the Receiver has incurred \$28,872.13 in reasonable and necessary fees and costs
 5 in responding to Ms. Dean’s objections.¹⁴ The Receiver also incurred an additional \$3,931.48 in
 6 fees preparing the instant Memorandum of Fees.¹⁵ See *Clark v. City of L.A.*, 803 F.2d 987, 992
 7 (9th Cir 1986) (holding that fees incurred for work on fee petitions are compensable); *Camacho v.*
 8 *Bridgeport Fin., Inc.*, 523 F.3d 973, 981 (9th Cir. 2008) (finding “it would be inconsistent to dilute
 9 a fees award by refusing to compensate attorneys for the time they reasonably spent in establishing
 10 their rightful claim to the fee.”). Thus, a total award of \$32,803.61 in attorneys’ fees is reasonable
 11 upon consideration of the following factors.

12 **a. The Time and Labor Required¹⁶**

13 The Receiver spent 81 hours responding to Ms. Dean’s objections.¹⁷ The time spent
 14 included, among other things, reviewing Ms. Dean’s filings and the preparation, research, and
 15 drafting of the Receiver’s response to the same.¹⁸

16 Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably possible
 17 with Associate Christian Spaulding accounting for approximately 64% of the 81 total hours
 18 worked.¹⁹ Greenberg Traurig took care not to overstaff this matter.²⁰ Mr. Spaulding did the
 19 majority of the research and drafting associated with the Response to Ms. Dean’s objections.²¹
 20 Kara Hendricks provided guidance and direction regarding the responses and reviewed and revised

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 23 ¹⁴ **Exhibit 1**, Declaration of Kara Hendricks (the “Hendricks Decl.”) at ¶ 15.

24 ¹⁵ **Exh. 1**, Hendricks Decl. at ¶ 16.

25 ¹⁶ Allen Matkins assisted in this matter in a limited role, expending only 0.9 hours for a total of \$472.50.
 Given the relatively small amount of time billed by Allen Matkins, the Receiver is not seeking
 reimbursement for the same. As such, the hours included in this Memorandum of Fees represent only those
 fees incurred by Greenberg Traurig.

26 ¹⁷ **Exh. 1**, Hendricks Decl. at ¶ 17.

27 ¹⁸ *Id.* at ¶ 18.

28 ¹⁹ *Id.* at ¶ 19.

²⁰ *Id.* at ¶ 20.

²¹ *Id.* at ¶ 21.

1 initial drafts of the same.²² The remainder of the hours spent are attributed to Associate Kyle
2 Ewing, accounting for 16.1 hours.²³ Mr. Ewing researched, analyzed and drafted briefs in response
3 to Ms. Dean’s filings and also assisted Mrs. Hendricks and Mr. Spaulding in their efforts in this
4 matter.²⁴ As can be seen from the billing entries on this matter, Greenberg Traurig took care to
5 ensure an efficient use of resources and that efforts were not duplicated.²⁵ Given the foregoing
6 and in light of the circumstances giving rise to this matter, the 81 hours spent by Greenberg Traurig
7 were reasonable and appropriate.²⁶

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

9 In general, proceedings in an equitable receivership are inherently complex. *See SEC v.*
10 *Hardy*, 803 F.2d 1034, 1037 (9th Cir. 1986) (finding the district court has broad powers and wide
11 discretion to determine the appropriate relief in an equity receivership because most receiverships
12 involve multiple parties and complex transactions); *see also Sec. & Exch. Com. v. W. L. Moody &*
13 *Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 486 (S.D. Tex. 1974) (“An equitable
14 receivership is by its very nature, a legally complex process”). The matters herein are no
15 different.

16 This Memorandum of Fees arises from the numerous, repetitive, and voluminous filings
17 made by Ms. Dean following the Court’s order granting the Receiver’s Motion to Compel. To put
18 this issue in proper context, it must be noted that the parties are before this Court *solely* because
19 Ms. Dean failed to comply with a court order, specifically the Court’s Asset Freeze and Turnover
20 Order as requested by the Receiver in June 2022.²⁷ At that time, and as confirmed by this Court,
21 it was clear the funds held by Ms. Dean were receivership property. Despite this, the Receiver’s
22 efforts to obtain Ms. Dean’s compliance have now spanned more than nine (9) months. Thus, it
23 is no surprise that the Receiver and the Receivership Estate have expended significant resources
24 toward this matter in an attempt to recoup funds that should have been turned over from the outset.

25 ²² **Exh. 1**, Hendricks Decl. at ¶ 22.

26 ²³ *Id.* at ¶ 23.

27 ²⁴ *Id.* at ¶ 24.

28 ²⁵ *Id.* at ¶ 25.

²⁶ *Id.* at ¶ 26.

²⁷ *See* ECF No. 210 wherein the background giving rise to the Motion to Compel is described in detail.

1 The Court recognized this in the Order stating the Fee Order “was merely the court’s attempt to
2 make the Receiver whole for the fees he incurred in filing his motion to compel, which was
3 necessary only because of Dean’s refusal to return the receivership property.”²⁸ In other words,
4 the fees requested through this Memorandum of Fees, and those awarded by the Court on
5 December 29, 2022, represent the Court’s determination of the amount necessary to bring the
6 Receiver to the position he would have been had Ms. Dean complied from the outset.

7 Over the course of the past nine (9) months, the Receiver has been tasked with analyzing
8 numerous theories, case law, statutes, and codes including, but not limited to, contempt, allocation
9 of receivership property for the payment of attorneys’ fees, modifications to asset freeze orders,
10 rules of professional conduct and personal jurisdiction, ultimately prevailing and receiving an
11 award of attorney fees incurred for succeeding in his position. However, Ms. Dean imposed an
12 additional burden upon the Receiver and the Receivership Estate through her baseless objections
13 (ECF Nos. 380, 423) and her improper “Opposition” to the Receiver’s prior Memorandum of Fees
14 and Costs. What is more, Ms. Dean’s voluminous filings were replete with arguments already
15 ruled upon in prior motions and in at least one instance, contained the very same arguments already
16 presented to the court.²⁹ As such, the Receiver was forced to devote a significant amount of time
17 to adequately address each filing, even though the filings lacked substantive merit from the outset
18 and lacked any procedural basis following the objected-to orders of Magistrate Judge Youchah.

19 The Receiver’s efforts in this respect can be divided into two categories: (1) those related
20 to Ms. Dean’s objection to the Order Granting the Receiver’s Motion to Compel; and (2) those
21 related to Ms. Dean’s Objection to the Fee Order.³⁰ As discussed below, the Receiver incurred
22 significant expense in each.

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27 ²⁸ ECF No. 473 at n. 3.

28 ²⁹ ECF No. 473 at p. 4.

³⁰ **Exh. 1**, Hendricks Decl. at ¶ 27.

1 **i. Ms. Dean’s Objection to the Order Granting the Receiver’s**
 2 **Motion to Compel**

3 On November 17, 2022, this Court entered its Order Granting the Receiver’s Motion to
 4 Compel.³¹ In granting the Motion to Compel, the Court ordered Ms. Dean to turnover the
 5 remaining funds that were at issue and also awarded the Receiver his fees and costs incurred in
 6 bringing the Motion to Compel.³² On December 1, 2022, Ms. Dean submitted her Objection to
 7 the Order Granting the Receiver’s Motion to Compel in which Ms. Dean raised a bevy of issues,
 8 each of which were previously argued.³³ Moreover, the Court found that Ms. Dean had failed to
 9 meet her burden.³⁴

10 In total, the Receiver devoted 35.1 hours to responding to Ms. Dean’s Objection to the
 11 Order Granting the Receiver’s Motion to Compel for a total of \$12,014.64.³⁵

12 **ii. Ms. Dean’s Objection to the Fee Order**

13 As noted above, the Court granted the Receiver’s request for attorney fees related to the
 14 Motion to Compel and ultimately awarded the Receiver \$33,755.24.³⁶ Prior to its order, however,
 15 Ms. Dean submitted yet another rogue filing styled as an “Opposition” to the Receiver’s “Motion
 16 for Attorneys’ Fees and Costs.”³⁷ Given that the Court did not order briefing on this issue and in
 17 light of the fact that Ms. Dean’s purported Opposition made baseless and serious accusations
 18 against the Receiver and involved matters outside of the Receiver’s Memorandum of Fees, the
 19 Receiver was compelled to move to strike portions of her filing as improper and also request leave
 20 to file a reply brief (the “Motion to Strike”).³⁸ Before the Court ruled upon the Motion to Strike,
 21 the Court entered its Fee Order.³⁹ Given that the fee request had been determined, the Court denied
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 24 ³¹ ECF No. 368.

25 ³² *Id.*

26 ³³ ECF No. 380.

27 ³⁴ *Id.*

28 ³⁵ **Exh. 1**, Hendricks Decl. at ¶ 28.

³⁶ ECF No. 417.

³⁷ ECF Nos. 394, 395.

³⁸ ECF No. 409.

³⁹ ECF No. 417.

1 the Receiver's Motion to Strike as moot following the Fee Order.⁴⁰ In total, the Receiver spent
 2 14.3 hours responding to Ms. Dean's improper Opposition to the Receiver's Memorandum of
 3 Fees, including drafting the Motion to Strike, for a total of \$5,081.29.⁴¹

4 But Ms. Dean did not stop there. Ms. Dean submitted yet another objection, this time
 5 seeking appeal of the Fee Order. Ultimately, the Court found that Ms. Dean's Objection to the
 6 Fee Order was frivolous and demonstrated a willful and intentional waste of judicial and
 7 receivership resources.⁴² With respect to Ms. Dean's Objection to the Fee Order alone, the
 8 Receiver spent 31.6 hours, totaling \$11,752.58.⁴³

9 As can be seen from the tortured history of this dispute, Ms. Dean has repeatedly filed
 10 voluminous documents which, although often repeating and re-hashing old arguments, required
 11 substantial research, analysis and briefing on behalf of the Receiver.⁴⁴ Indeed, the arguments made
 12 by Ms. Dean, although ultimately without merit, involved complex legal theories required the
 13 review of an exorbitant amount of case law.⁴⁵ What is worse, all of the work imposed upon the
 14 Receiver through Ms. Dean's filings was for naught. Ms. Dean did not succeed on a single aspect
 15 of her objections and the parties are in the same spot as they were on December 29, 2022, when
 16 the Court ordered Ms. Dean to pay the Receiver \$33,755.24.⁴⁶

17 Given the wide range of issues presented in the numerous filings submitted following the
 18 Receiver's Motion to Compel, this Court may reasonably find the matters addressed in the
 19 Receiver's Response to Ms. Dean's Objections were complex, novel, and difficult.

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23 ⁴⁰ ECF No. 420 at p. 1.

24 ⁴¹ **Exh. 1**, Hendricks Decl. at ¶ 29.

25 ⁴² ECF No. 473 at p. 6.

26 ⁴³ **Exh. 1**, Hendricks Decl, at ¶ 30.

27 ⁴⁴ See ECF No. 417 at p. 3 (noting that, even before her objections, Ms. Dean had filed 103 pages of
 28 briefing excluding exhibits).

⁴⁵ For example, Ms. Dean's Objection to the Order Granting the Receiver's Motion to Compel contained
 citations to at least 77 cases. See ECF No. 380 at pp. 4-6. Ms. Dean's additional filings were likewise
 littered with case law.

⁴⁶ ECF No. 417.

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

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

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

7 Greenberg Traurig is a global firm of significant capacity, such that although individual
8 lawyers may have been working at capacity on this matter, the firm was not, as a whole, precluded
9 from performing other work. However, given the breadth of the matters at issue in this case, the
10 substantial amount of time devoted to addressing Ms. Dean’s meritless filings could have been
11 allocated to other efforts to preserve and marshal the Receivership Estate. Indeed, as of the date
12 of this filing, the Receiver and his counsel continue to work diligently to locate and take control
13 of all receivership assets in accordance with the Appointment Order. As such, the 81 hours
14 allocated to responding to Ms. Dean’s baseless objection precluded the Receiver from utilizing
15 that time to further the interests of the Receivership Estate.

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

17 Greenberg Traurig has been approved by this Court as counsel for the Receiver.⁴⁷ As set
18 forth in the Motion For Order Authorizing Receiver to Employ Counsel (ECF No. 89), Greenberg
19 Traurig agreed to a substantial reduction of its customary rates in this case. With respect to the
20 fees sought through the instant Memorandum, Greenberg Traurig charged the rates previously
21 approved by this Court.⁴⁸ Indeed, only three Greenberg Traurig employees worked on this matter,
22 each of whom charged rates previously approved by this Court. Shareholder Kara Hendricks
23 devoted 13.2 hours to this dispute for a total of \$6,442.06, averaging \$488.03 per hour.⁴⁹ Associate
24

25 ⁴⁷ ECF Nos. 89, 219.

26 ⁴⁸ ECF Nos. 219, 315 – Order Approving Amended First Application of Receiver and Receiver’s
27 Professionals for Allowance and Payment of Fees and Costs for the Period From June 3, 2022 through June
28 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.

⁴⁹ Through the Receiver’s Motion to Employ Counsel (ECF No. 89), this Court approved Mrs. Hendricks
hourly rate of \$480.25. ECF No. 219.

1 Christian Spaulding worked 51.7 hours, for a total of \$16,483.57, averaging \$318.83 per hour.⁵⁰
2 Associate Kyle Ewing spent 16.1 hours on this matter for a total of \$5,474.00, averaging \$340 per
3 hour.⁵¹ As can be seen from the foregoing, Greenberg Traurig worked this matter at a significant
4 discount from its ordinary rates.

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

6 The Receiver's efforts in response to Ms. Dean's objections were performed under narrow
7 time limitations. As noted herein, this matter was first brought before this Court on August 1,
8 2022 (ECF No. 210). Preceding the Receiver's Motion to Compel, significant resources were
9 spent attempting to obtain Ms. Dean's compliance without court intervention. However, Ms. Dean
10 did not oblige and the parties engaged on a contorted course of litigation, replete with procedurally
11 improper filings, repeat arguments, and multiple objections to magistrate orders which proved to
12 have no valid basis. With this in mind, the Receiver endeavored to allocate sufficient resources to
13 Ms. Dean's filings while simultaneously continuing his efforts to recover funds for the
14 Receivership Estate. All of the Receiver's efforts in this case are necessarily conducted with a
15 "time is of the essence" mentality as each additional day that funds and/or assets are held by third
16 parties presents the possibility of dissipation of Receivership Property, potentially diminishing the
17 availability of recovery for the victims of the Ponzi-scheme. In other words, for each day that
18 Ms. Dean held the funds that she had received by Judd and each Ms. Dean prolonged her payment
19 of the attorneys' fees incurred by the Receiver, the Receiver was deprived of the ability to marshal
20 and preserve those funds for the benefit of the victims. For this reason, collection efforts, such as
21 those directed toward Ms. Dean, are conducted under tight time limitations.

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

23 GT was chosen by the Receiver as counsel based on GT's expertise and ability to
24 adequately represent the Receiver and assist in the duties and obligations under the Appointment
25 Order and the firm's local contacts and expertise.⁵² GT is AV rated by Martindale Hubbell and

26 ⁵⁰ Through the Receiver's Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Spaulding's
27 hourly rate of \$318.75. ECF No. 219.

28 ⁵¹ Through the Receiver's Motion to Employ Counsel (ECF No. 89), this Court approved Mr. Ewing's
hourly rate of \$340.00. ECF No. 219.

⁵² **Exh, 1**, Hendricks Decl. at ¶ 6.

1 has an excellent reputation in the legal community.⁵³ Moreover, GT has extensive experience in
 2 all areas of litigation as well as in receivership matters.⁵⁴

3 Kara Hendricks is a shareholder in GT's Las Vegas office and has over 20 years of
 4 experience litigating matters as well as working with companies to resolve disputes outside of the
 5 litigation context.⁵⁵ Ms. Hendricks is experienced representing businesses in all manners of
 6 contract disputes, litigating products liability matters, handling catastrophic injury cases,
 7 defending civil rights claims, litigating employment non-compete agreements, handling derivative
 8 suits, resolving property and construction defect disputes, assessing insurance coverage issues, and
 9 has represented receivers appointed to handle matters involving insolvent insurance companies.⁵⁶

10 Kyle Ewing and Christian Spaulding are associates in the Las Vegas office and regularly
 11 practice in both the state and federal district courts of Nevada.⁵⁷ Kyle Ewing has been practicing
 12 since 2015 and has experience handling large scale and complex litigation in state and federal
 13 court.⁵⁸ Likewise, Christian Spaulding has been practicing since 2016 and has experience handling
 14 large scale and complex litigation in state and federal court.⁵⁹ As a shareholder, Mrs. Hendricks
 15 oversaw GT's role in this matter, with Mr. Ewing and Mr. Spaulding handling the bulk of the
 16 research, drafting, and analysis required.⁶⁰

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

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

22 ///

24 ⁵³ **Exh, 1**, Hendricks Decl. at ¶ 7.

25 ⁵⁴ *Id.* at ¶ 8.

26 ⁵⁵ *Id.* at ¶ 9.

27 ⁵⁶ *Id.* at ¶ 10.

28 ⁵⁷ *Id.* at ¶ 11.

⁵⁸ **Exh, 1**, Hendricks Decl. at ¶ 12.

⁵⁹ *Id.* at ¶ 13.

⁶⁰ *Id.* at ¶ 14.

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

2 Shortly after being appointed by this Court, the Receiver retained Greenberg Traurig to
3 assist him in carrying out his duties under the Appointment Order. ECF No. 89. In the
4 nine (9) months since being retained, Greenberg Traurig has worked closely with the Receiver and
5 performed a litany of services to assist the Receiver in carrying out his duties. Greenberg Traurig
6 also represents the Receiver in other receivership actions pending in this District.

7 **j. *Awards in Similar Cases***

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

22 With respect to the services rendered by Greenberg Traurig, the Receiver seeks
23 compensation for 81 hours of work at a blended rate of approximately \$350.61 per hour (exclusive
24 of the fees incurred in drafting the instant Memorandum). Attached to Ms. Hendricks' declaration
25 attached hereto are the itemized billing entries showing the time worked in tenths of hours.⁶¹

26 ///

27 _____
28 ⁶¹ 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 \$32,803.61 which includes the
6 fees incurred in preparing the instant Memorandum.

7 DATED this 10th day of March 2023.

8 **GREENBERG TRAUIG, LLP**

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

10 KARA B. HENDRICKS, Bar No. 07743
11 JASON K. HICKS, Bar No. 13149
12 KYLE A. EWING, Bar No. 014051
13 10845 Griffith Peak Drive, Suite 600
14 Las Vegas, Nevada 89135

15 *Attorneys for Receiver Geoff Winkler*

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

CERTIFICATE OF SERVICE

1
2 I hereby certify that, on the 10th day of March 2023, a true and correct copy of the
3 foregoing **MEMORANDUM OF FEES AND COSTS RELATING TO RESPONSE TO**
4 **NON-PARTY KAMILLE DEAN’S OBJECTIONS FROM MAGISTRATE ORDERS (ECF**
5 **Nos. 380, 423) PURSUANT TO ORDER AFFIRMING MAGISTRATE JUDGE’S ORDERS**
6 **(ECF No. 473)** was filed electronically via the Court’s CM/ECF system. Notice of filing will be
7 served on all parties by operation of the Court’s CM/ECF system, and parties may access this filing
8 through the Court’s CM./ECF system.

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

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

LIST OF EXHIBITS

EXHIBIT	DESCRIPTION	
Exhibit 1	Declaration of Kara B. Hendricks, Esq.	
	Exhibit A	GT Invoice Entries

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

EXHIBIT 1

EXHIBIT 1

Declaration of Kara B. Hendricks, 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
6 Telephone: (702) 792-3773
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 Plaintiff,

17 vs.

18 MATTHEW WADE BEASLEY; *et al.*,

19 Defendants,

20 THE JUDD IRREVOCABLE TRUST; *et al.*,

21 Relief Defendants.

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

**DECLARATION OF KARA B.
HENDRICKS IN SUPPORT
MEMORANDUM OF FEES AND
COSTS RELATING TO RESPONSE
TO NON-PARTY KAMILLE DEAN’S
OBJECTIONS FROM MAGISTRATE
ORDERS (ECF NOS. 380, 423)
PURSUANT TO ORDER AFFIRMING
MAGISTRATE JUDGE’S ORDERS
(ECF NO. 473)**

22
23 I, KARA B. HENDRICKS, ESQ. declare as follows:

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

26 2. By virtue of my position with Greenberg Traurig, I am competent to testify to the
27 matters presented in this declaration, and I submit this declaration in support of the Receiver’s
28 Memorandum of Fees and Costs Relating to Response to Non-Party Kamille Dean’s Objections

1 From Magistrate Orders [ECF Nos. 380, 423] Pursuant to Order Affirming Magistrate Judge’s
2 Orders [ECF No. 473] (the “Memorandum of Fees”).

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

5 4. Greenberg Traurig was retained by the Receiver in June 2022.

6 5. The Receiver selected Greenberg Traurig as one of two firms serving as general
7 receivership counsel due to the firm's litigation experience, receivership experience, and strong
8 Nevada base.

9 6. GT was chosen by the Receiver as counsel based on GT’s expertise and ability to
10 adequately represent the Receiver and assist in the duties and obligations under the Appointment
11 Order and the firm’s local contacts and expertise.

12 7. GT is AV rated by Martindale Hubbell and has an excellent reputation in the legal
13 community.

14 8. Moreover, GT has extensive experience in all areas of litigation as well as in
15 receivership matters.

16 9. I am a shareholder in GT’s Las Vegas office and have over 20 years of experience
17 litigating matters as well as working with companies to resolve disputes outside of the litigation
18 context.

19 10. I am experienced representing businesses in all manners of contract disputes,
20 litigating products liability matters, handling catastrophic injury cases, defending civil rights
21 claims, litigating employment non-compete agreements, handling derivative suits, resolving
22 property and construction defect disputes, assessing insurance coverage issues, and has
23 represented receivers appointed to handle matters involving insolvent insurance companies.

24 11. Kyle Ewing and Christian Spaulding are associates in the Las Vegas office and
25 regularly practice in both the state and federal district courts of Nevada.

26 12. Kyle Ewing has been practicing since 2015 and has experience handling large
27 scale and complex litigation in state and federal court.

28 ///

1 13. Likewise, Christian Spaulding has been practicing since 2016 and has experience
2 handling large scale and complex litigation in state and federal court.

3 14. As a shareholder, I oversaw GT's role in this matter with Mr. Ewing and
4 Mr. Spaulding handling the bulk of the research, drafting and administrative work required.
5 Additionally, Cynthia Ney, is an experienced paralegal in GT's Las Vegas office and has assisted
6 in the handling of numerous matters in both state and federal courts.

7 15. In total, the Receiver has incurred \$28,872.13 in reasonable and necessary fees
8 and costs in responding to Ms. Dean's objections.

9 16. The Receiver also incurred an additional \$3,931.48 in fees preparing the instant
10 Memorandum of Fees.¹

11 17. The Receiver spent 81 hours responding to Ms. Dean's objections.

12 18. The time spent included, among other things, reviewing Ms. Dean's filings and
13 the preparation, research, and drafting of the Receiver's response to the same.

14 19. Greenberg Traurig allocated its efforts in this matter as efficiently as reasonably
15 possible with Associate Christian Spaulding accounting for approximately 64% of the 81 total
16 hours worked.

17 20. Greenberg Traurig took care not to overstaff this matter.

18 21. Mr. Spaulding did the majority of the research and drafting associated with the
19 Response to Ms. Dean's objections.

20 22. I provided guidance and direction regarding the responses and reviewed and
21 revised initial drafts of the same.

22 23. The remainder of the hours spent are attributed to Associate Kyle Ewing,
23 accounting for 16.1 hours.

24 24. Mr. Ewing researched, analyzed and drafted briefs in response to Ms. Dean's
25 filings and also assisted Mrs. Hendricks and Mr. Spaulding in their efforts in this matter.

26
27
28 ¹ For the fees incurred in drafting this Memorandum of Fees, a 15% discount was applied to the amount reflected on the March 2023 pre-bill attached hereto to reflect the hourly rates approved by this Court. ECF No. 219. Additionally, the fees incurred by paralegal Cynthia Ney were reduced to \$175.00 per hour consistent with this Court's order. ECF No. 219.

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

3 26. Given the foregoing and in light of the circumstances giving rise to this matter, the
4 81 hours spent by Greenberg Traurig were reasonable and appropriate.

5 27. The Receiver’s efforts in this respect can be divided into two categories: (1) those
6 related to Ms. Dean’s objection to the Order Granting the Receiver’s Motion to Compel; and
7 (2) those related to Ms. Dean’s Objection to the Fee Order.

8 28. In total, the Receiver devoted 35.1 hours to responding to Ms. Dean’s Objection
9 to the Order Granting the Receiver’s Motion to Compel for a total of \$12,014.64.

10 29. In total, the Receiver spent 14.3 hours responding to Ms. Dean’s improper
11 Opposition to the Receiver’s Memorandum of Fees, including drafting the Motion to Strike, for
12 a total of \$5,081.29.

13 30. With respect to Ms. Dean’s Objection to the Fee Order alone, the Receiver spent
14 31.6 hours, totaling \$11,752.58.

15 31. Given the foregoing and in light of the circumstances giving rise to this matter, the
16 81 hours spent by Greenberg Traurig were reasonable and appropriate.

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

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

21 Executed on March 10, 2023.

22 */s/ Kara B. Hendricks*
23 KARA B. HENDRICKS, ESQ.
24 Declarant
25
26
27
28

GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135
Telephone: (702) 792-3773 Facsimile: (702) 792-9002

EXHIBIT A

EXHIBIT A

GT Invoice Entries

DECEMBER
2022



Invoice No. : 1000224438
File No. : 209375.010100
Bill Date : February 14, 2023

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 1000197471

Total Fees: \$ 63,414.70

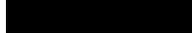
Expenses:

Filing Fees 40.00
Local Travel 4.00
Other Charges 1,010.00
Transcript Charges 187.00

Total Expenses: \$ 1,241.00

Current Invoice: \$ 64,655.70

Previous Balance (see attached statement): \$ 

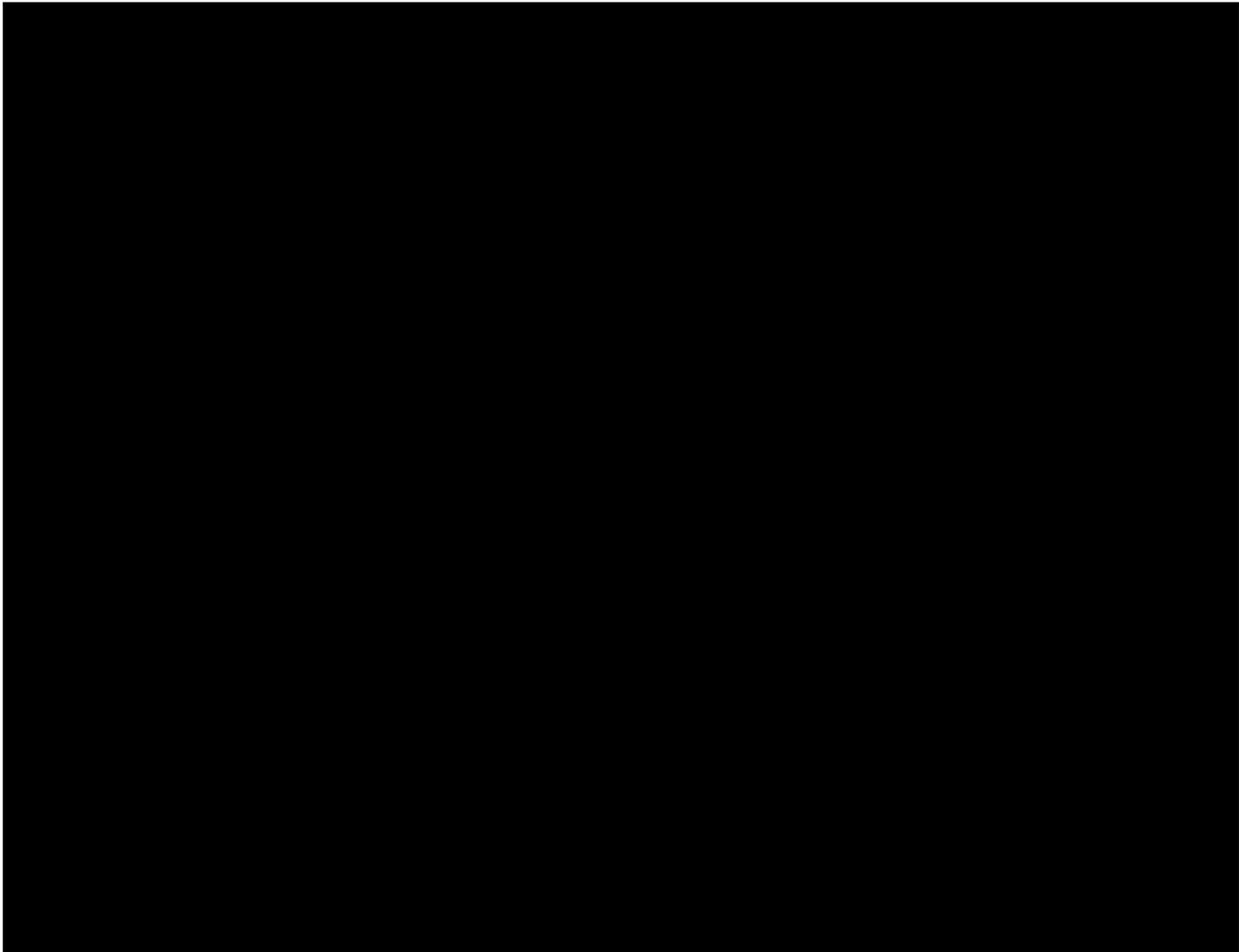
Total Amount Due: \$ 

KBH:LC
Tax ID: 13-3613083

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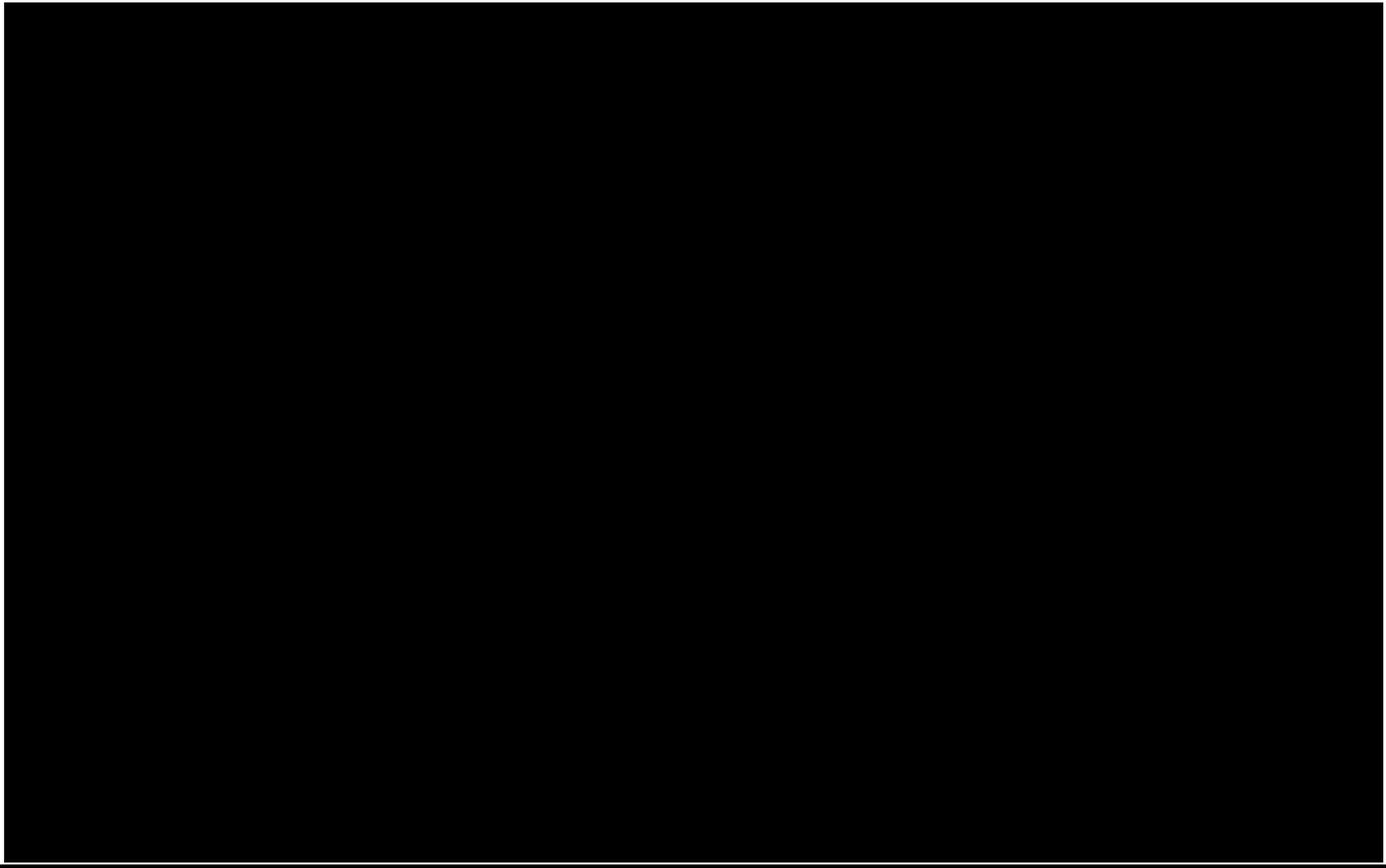
TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

DATE TIMEKEEPER DESCRIPTION HOURS AMOUNT

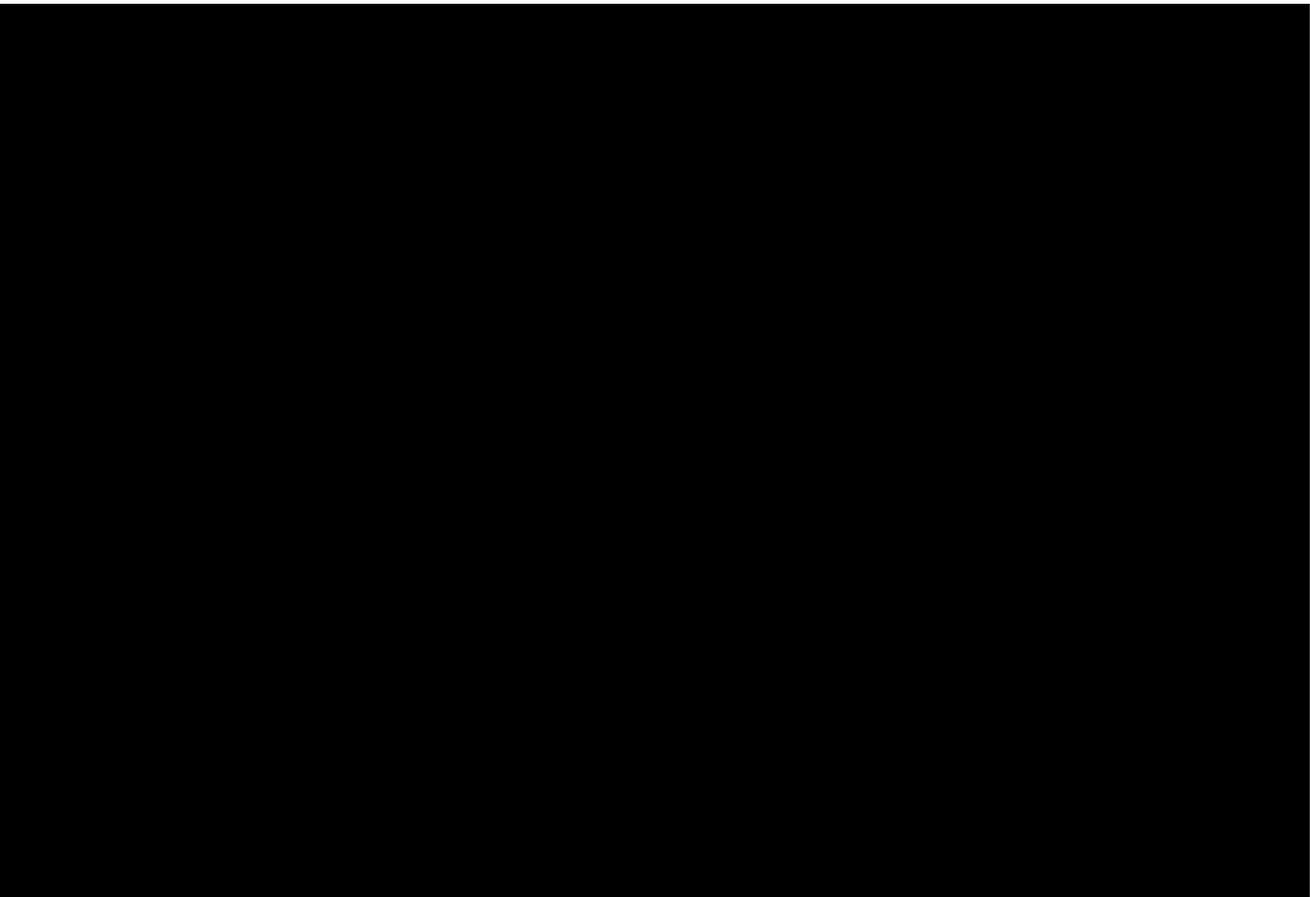


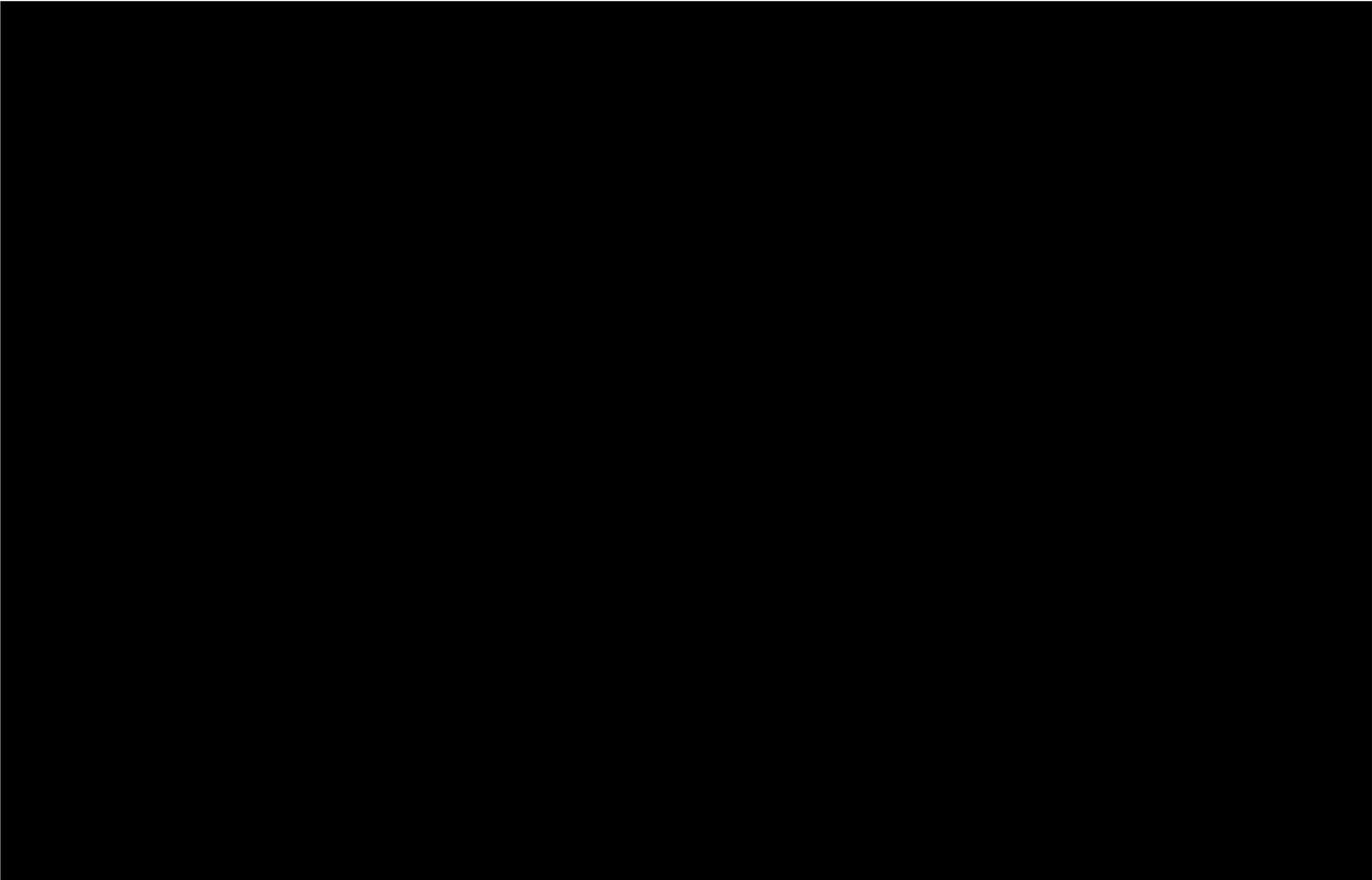
12/01/22	Kara B. Hendricks	Initial review of appeal of magistrate order and request C. Spaulding's assistance with response to same;	0.20	96.05
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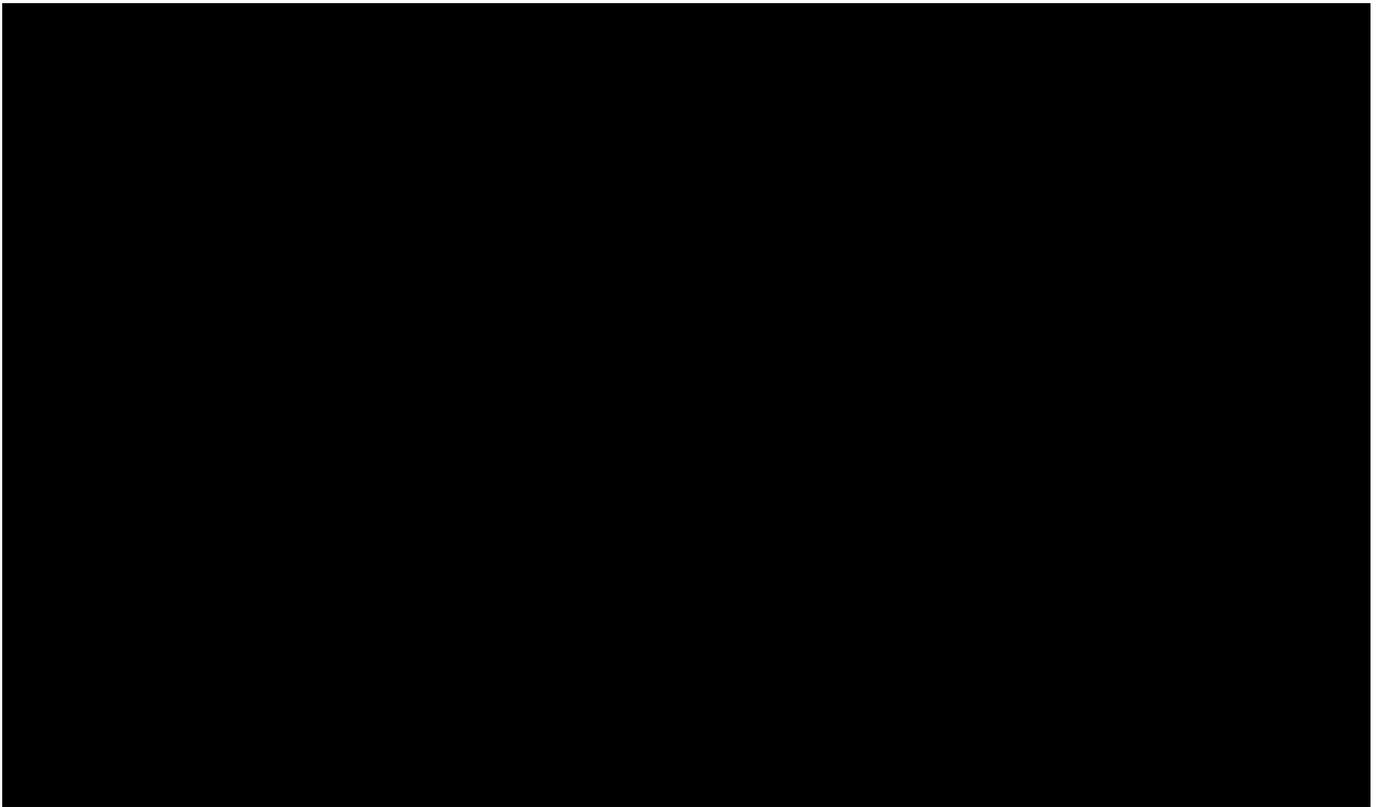


12/01/22	Christian Spaulding	Confer with team regarding Kamille Dean objection to Magistrate Order and response to the same.	0.30	95.62
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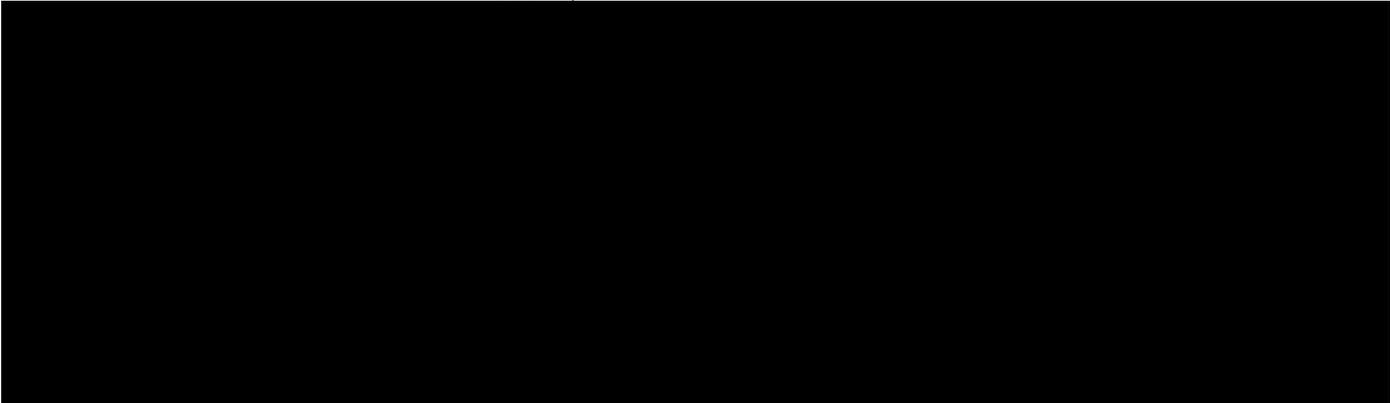


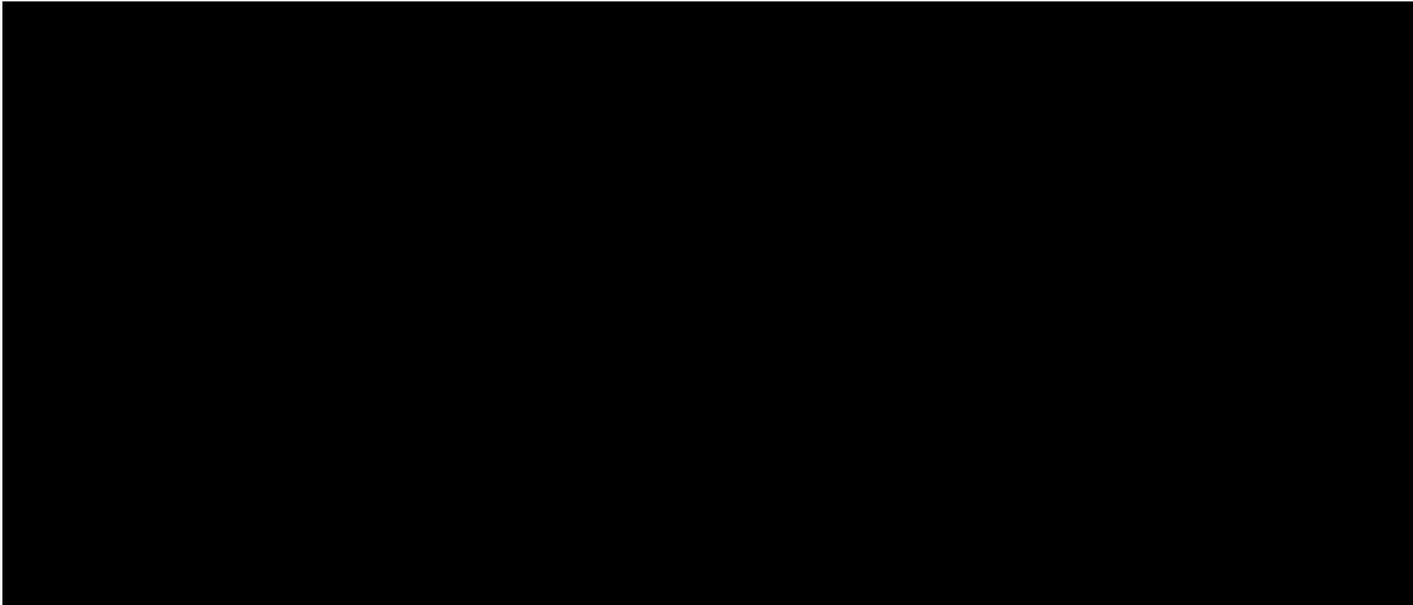
12/05/22	Kyle Ewing	Begin reviewing K. Dean's appeal/motion for reconsideration of magistrate judge order and relevant materials provided by J. DelCastillo (AM)	0.40	136.00
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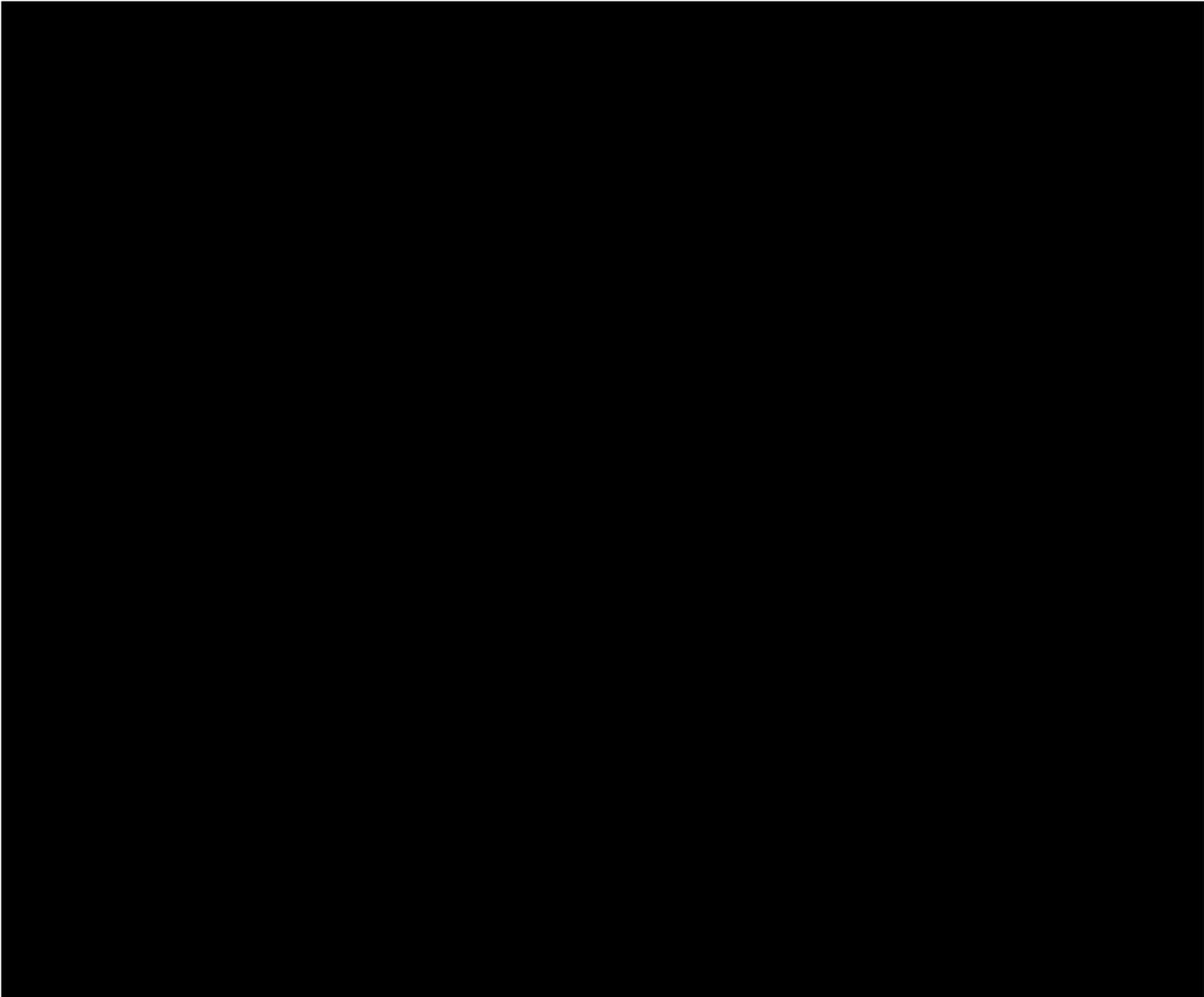


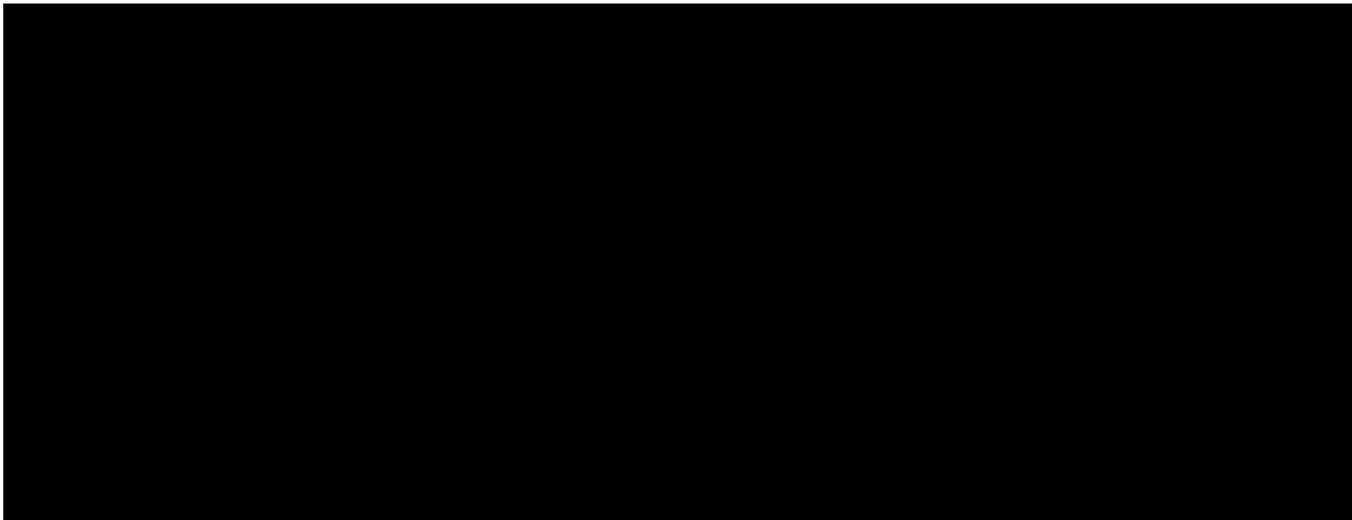
12/06/22	Kara B. Hendricks	Attention to K. Dean motion and declarations and outline issues for response to same;	0.60	288.15
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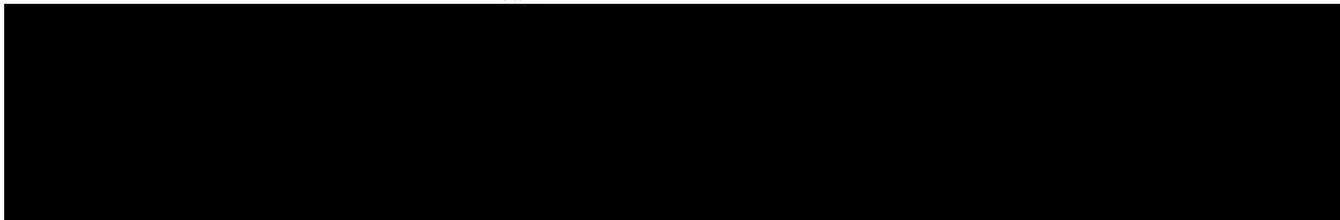


12/07/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to Dean motion and provide	0.20	96.05
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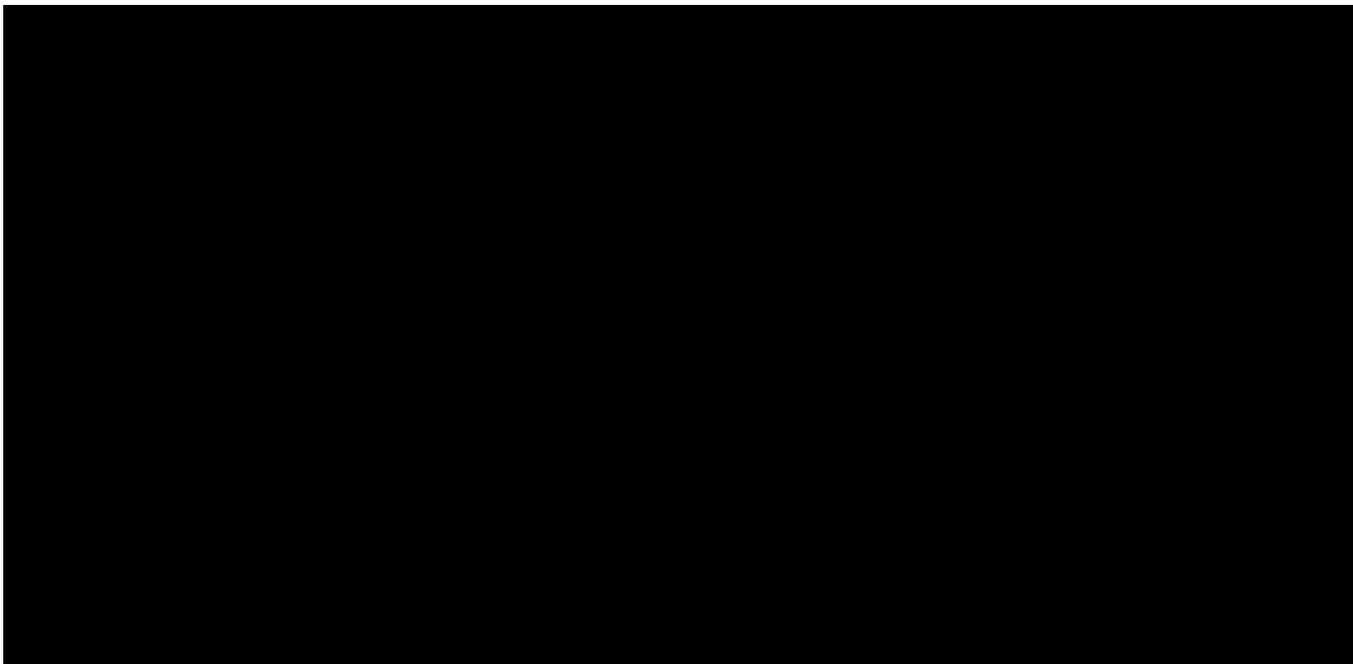




12/09/22	Christian Spaulding	Review grounds for appeal/objection to magistrate order and begin draft of response to objection filed by Kamille Dean.	6.30	2,008.12
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12/12/22	Kara B. Hendricks	Follow-up with C. Spaulding regarding response to Dean motion for reconsideration;	0.10	48.02
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12/12/22	Christian Spaulding	Evaluate Kamille Dean objection to Magistrate Order and review authority cited therein in preparation of draft response.	4.80	1,530.00
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12/12/22	Christian Spaulding	Continue draft response to Kamille Dean Objection to Magistrate Order.	3.20	1,020.00
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12/13/22	Kyle Ewing	Email communication with J. delCastillo re: legal standard for appeal/motion to reconsider magistrate judge's order granting fee award against attorney K.	0.30	102.00
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12/13/22	Kara B. Hendricks	Correspond with C. Spaulding regarding response to Dean motion to reconsider and request inclusion of local rule in standard to be addressed (.3); Review and revise response;	3.10	1,489.12
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12/13/22	Christian Spaulding	Confer and coordinate with team regarding applicable standard of review with respect to an objection to an order of a magistrate judge, such as that filed by Kamille Dean.	0.60	191.25
12/13/22	Christian Spaulding	Continue draft of Response to Kamille Dean objection to order of magistrate judge.	10.90	3,474.37

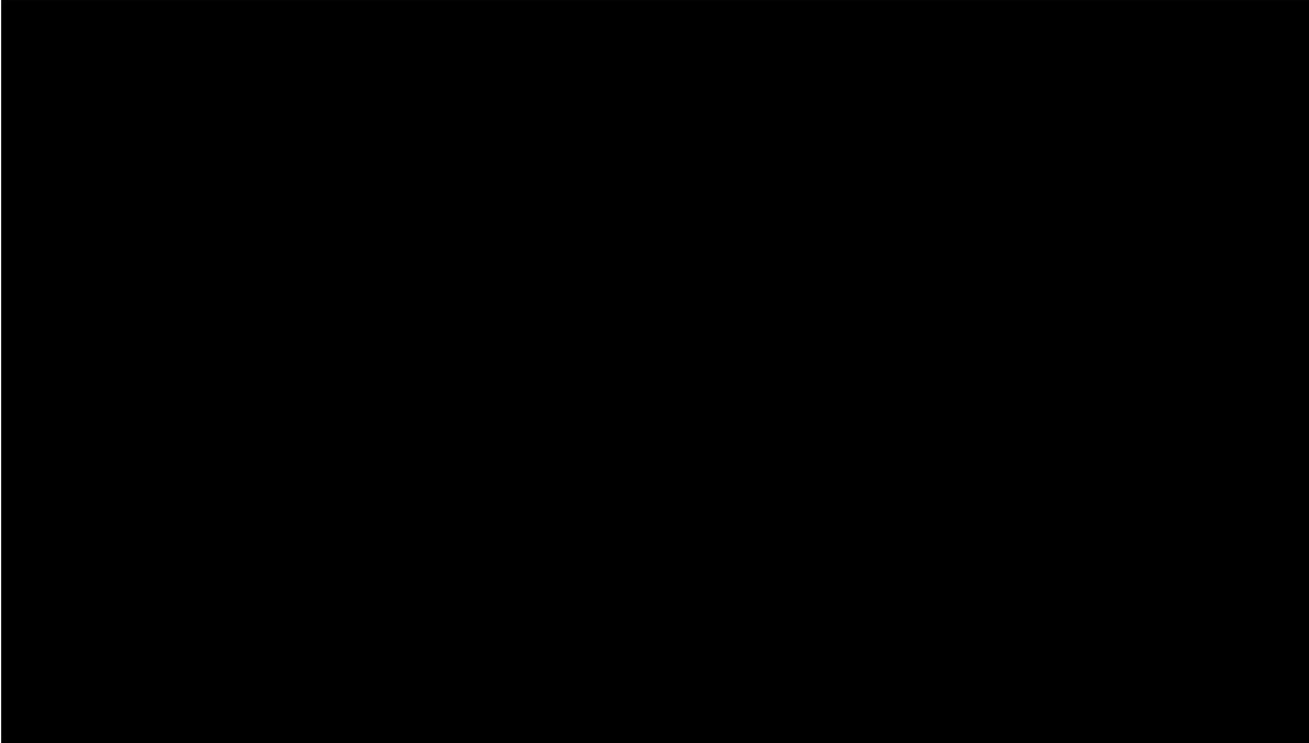
12/14/22	Kyle Ewing	Review and provide edits to response to K. Dean's appeal/objection to magistrate judge order compelling turnover of funds and awarding fees; conference with K. Hendricks re: the same	0.60	204.00
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12/14/22	Kara B. Hendricks	Attention to email from G. Winkler regarding response to Dean motion and follow-up with C. Spaulding (.2); Discuss local rule implications with K. Ewing and request he further update response (.1); Final review of response and finalize same (.3);	0.60	288.15
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12/14/22	Christian Spaulding	Proofread and finalize draft of Response to Kamille Dean Objection to Order on Motion to Compel.	1.50	478.12
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12/16/22	Kara B. Hendricks	Correspond with C. Spaulding relating to local rules and impact on response filed by Dean to memorandum of costs;	0.20	96.05
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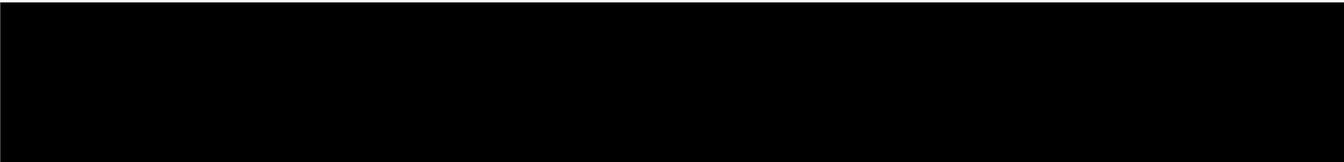
12/16/22	Kara B. Hendricks	Attention to objection to magistrate consideration and opposition to memorandum of fees from K. Dean and correspond with G. Winkler regarding same;	0.40	192.10
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12/16/22	Christian Spaulding	Confer with team regarding options related to impermissible filing by Kamille Dean in response to Memorandum of Fees and the Response to Appeal/Objection.	0.20	63.75
12/16/22	Christian Spaulding	Evaluate Kamille Dean response to Memorandum of Fees related to Motion to Compel.	0.40	127.50
12/17/22	Kyle Ewing	Email communication with K. Hendricks and C. Spaulding re: K. Dean's most recent frivolous filings and the Receiver's procedural options for addressing the same with the Court	0.20	68.00
12/17/22	Christian Spaulding	Evaluate local rules regarding permitted response/reply briefs with respect to Kamille Dean's response to Receiver's Memorandum of Fees.	0.30	95.62
12/19/22	Kyle Ewing	Review K. Dean's latest inappropriate	2.40	816.00

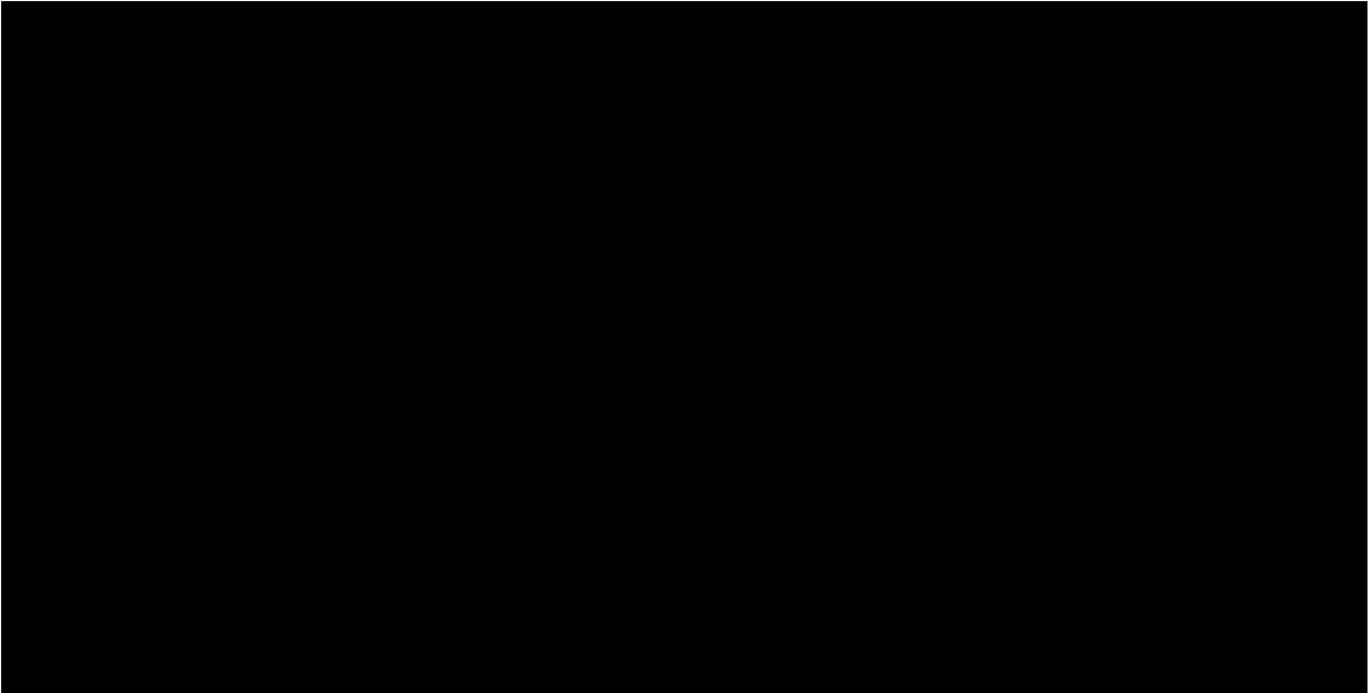
		filings and research legal issues and case law relied on by Dean in conjunction with the same		
12/19/22	Kyle Ewing	Draft outline of response and potential options for addressing K. Dean's latest inappropriate filings and potential motion for leave to file reply or to strike the same; begin drafting motion in connection with the same	3.50	1,190.00

12/20/22	Kyle Ewing	Finish drafting response to K. Dean's latest inappropriate filings and motion for leave to file reply or to strike the same; conference with K. Hendricks re: receiver's procedural options with respect to the same in light of Court's order precluding reply in support of Receiver's memorandum of fees and costs; review and revise the same to address comments of K. Hendricks	3.90	1,326.00
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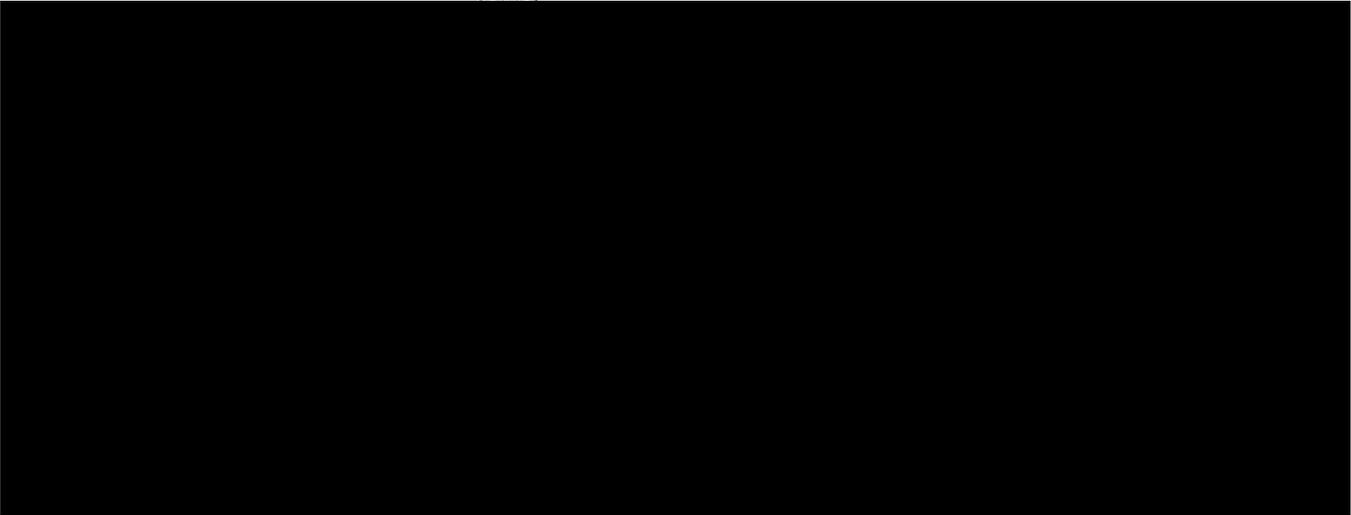
12/20/22	Kyle Ewing	Continue researching law in connection with reviewing K. Dean's most recent filings and objections and drafting Receiver's response to the same	1.50	510.00
12/20/22	Kara B. Hendricks	Follow-up with K. Ewing regarding request to strike K. Dean filing and get update regarding applicable case law and standards;	0.30	144.07



12/21/22	Kyle Ewing	Conference with K. Hendricks re: motion to strike or for leave to file sur-reply w/r/t K. Dean's latest improper filings	0.20	68.00
12/21/22	Kara B. Hendricks	Discuss motion to strike with K. Ewing and review and revise draft of same and circulate to G. Winkler for review; Work with E. Escobar-Gaddi to facilitate filing;	0.60	288.15

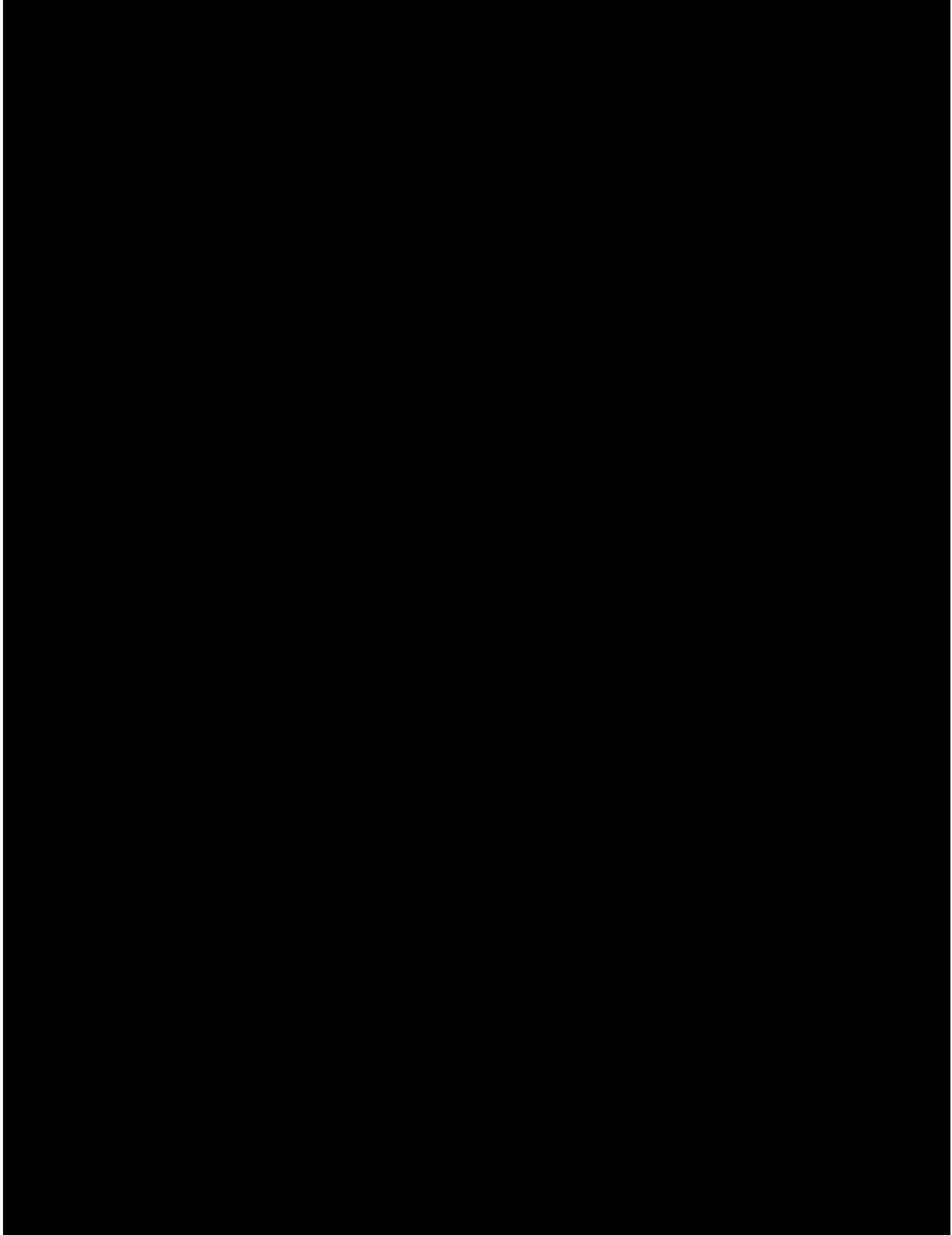


12/22/22	Kara B. Hendricks	Review new filings from K. Dean in support of her objection to Magistrate Order;	0.20	96.05
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12/27/22	Kyle Ewing	Review and analyze latest improper filings by K. Dean, including replies in support of her appeal of the magistrate judge's ruling in connection with determining what response, if any, is required from the	1.10	374.00
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receiver and whether a further motion to strike the procedurally improper filings is necessary; conference with K. Hendricks re: the same; research law in connection with the same

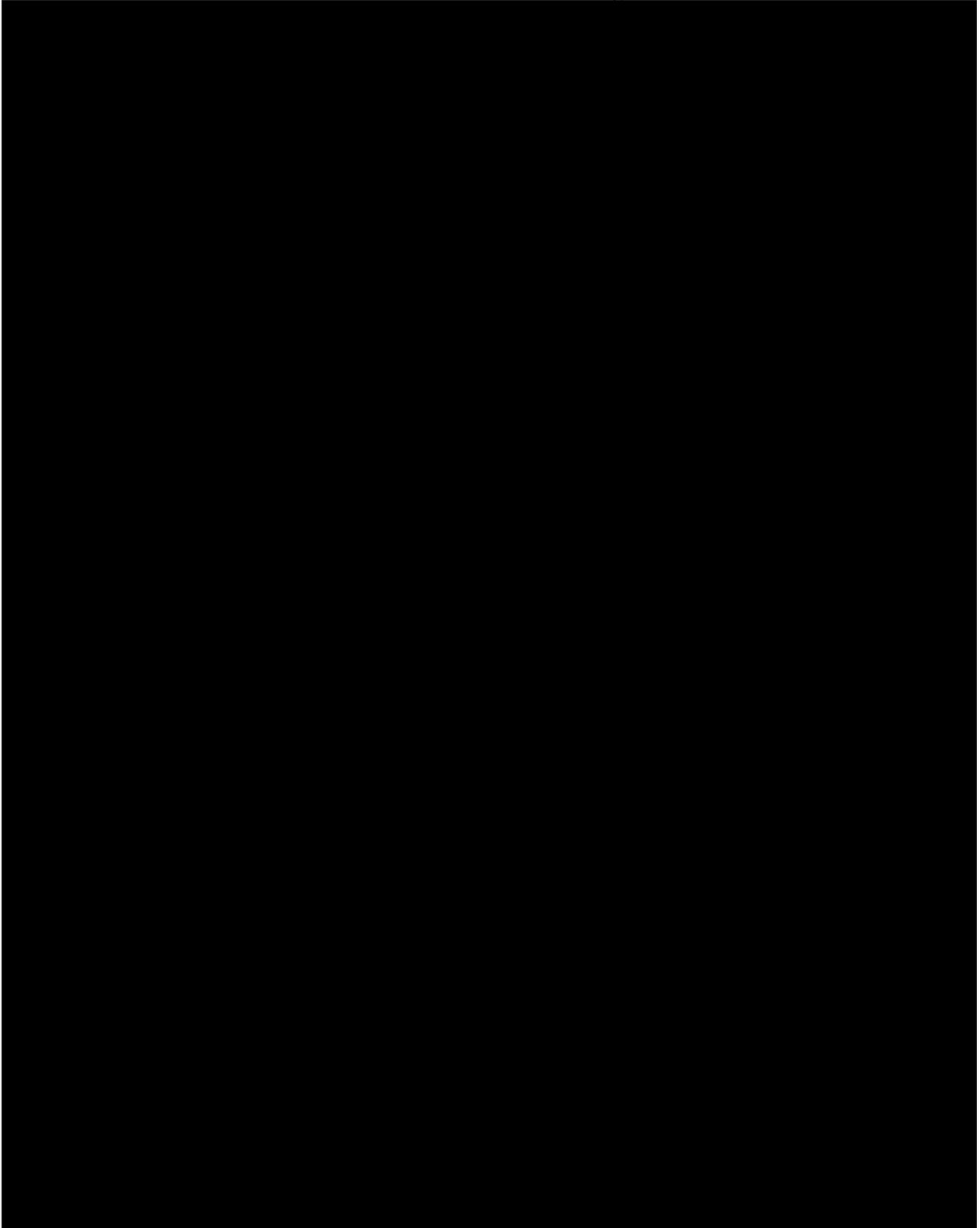


12/29/22 Kyle Ewing

[REDACTED]
Review and analyze order granting fee
award against K. Dean and discuss with K.
Hendricks in regard to Dean's repeated
filings and objections to J. Youchah's
orders since the order authorizing fees

0.10

34.00



JANUARY
2023



Invoice No.: 1000219800
File No. : 209375.010100
Bill Date : February 10, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through January 31, 2023:

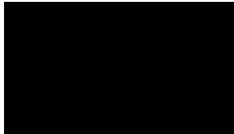
Total Fees: \$ 44,878.73

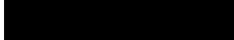
Expenses:

Business Meals 384.21
Messenger/Courier Services 52.50
Recording Charges 60.00
UPS Charges 15.22
Information and Research 69.00

Total Expenses: \$ 580.93

Current Invoice: \$ 45,459.66

Previous Balance (see attached statement): \$ 

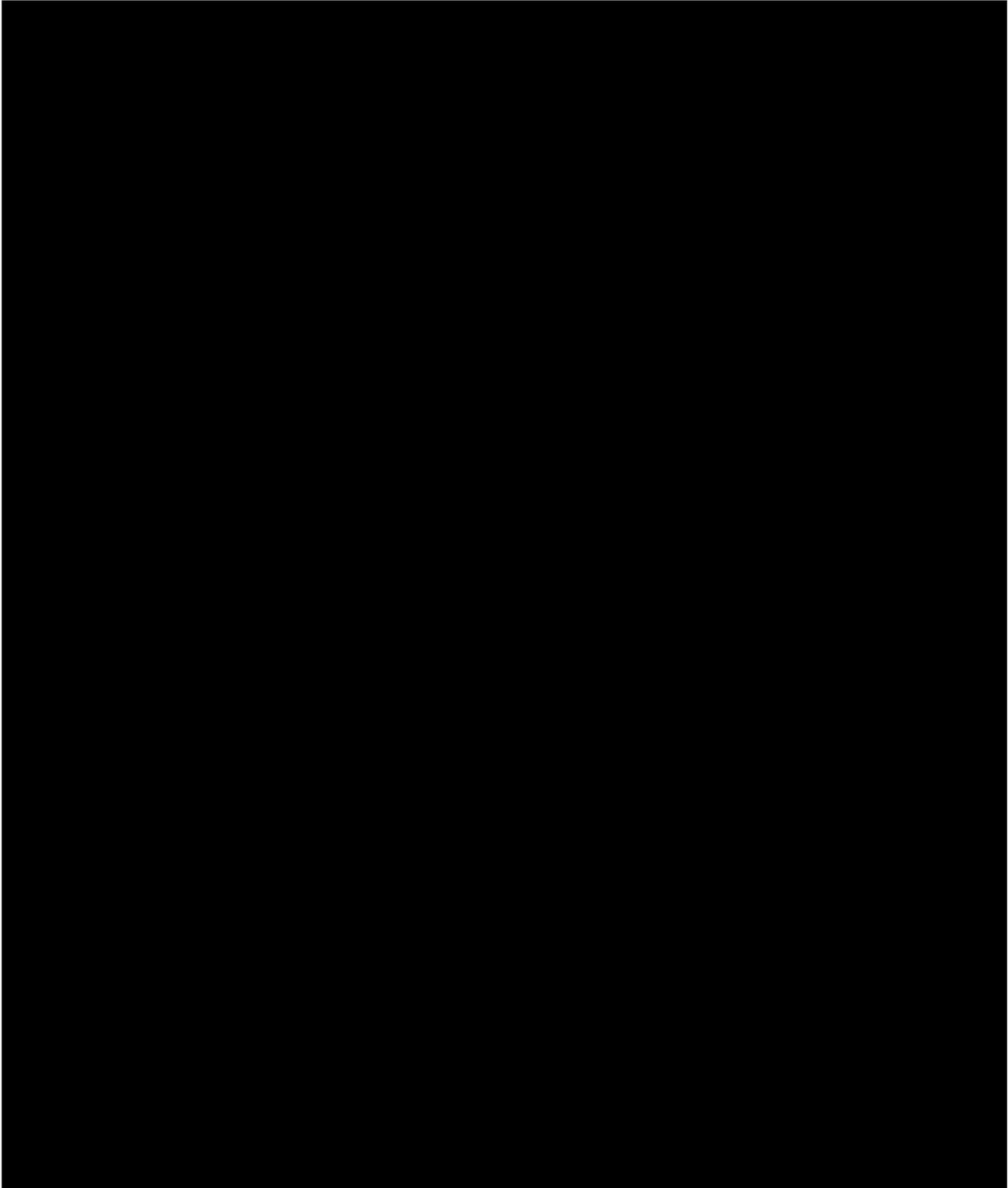
Total Amount Due: \$ 

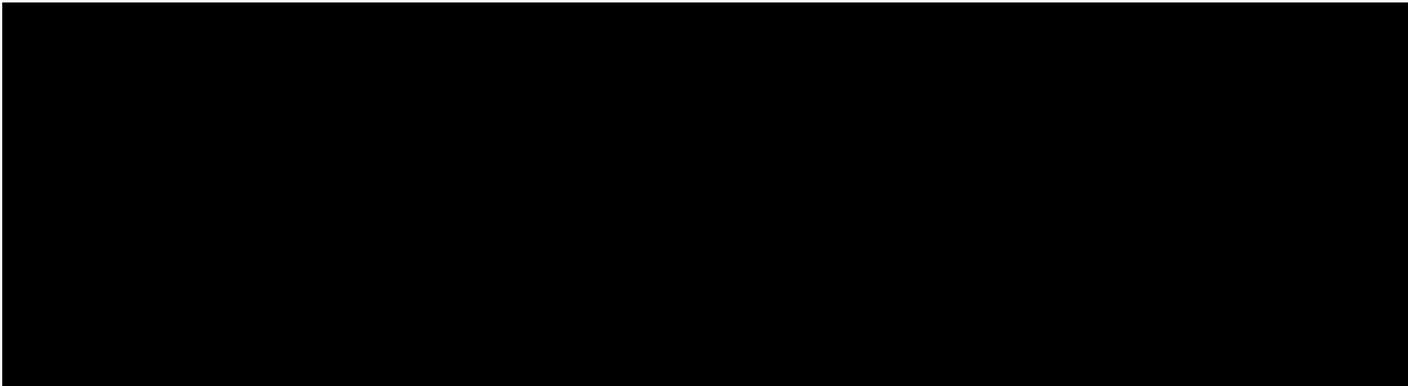
KBH:LC
Tax ID: 13-3613083

Description of Professional Services Rendered:

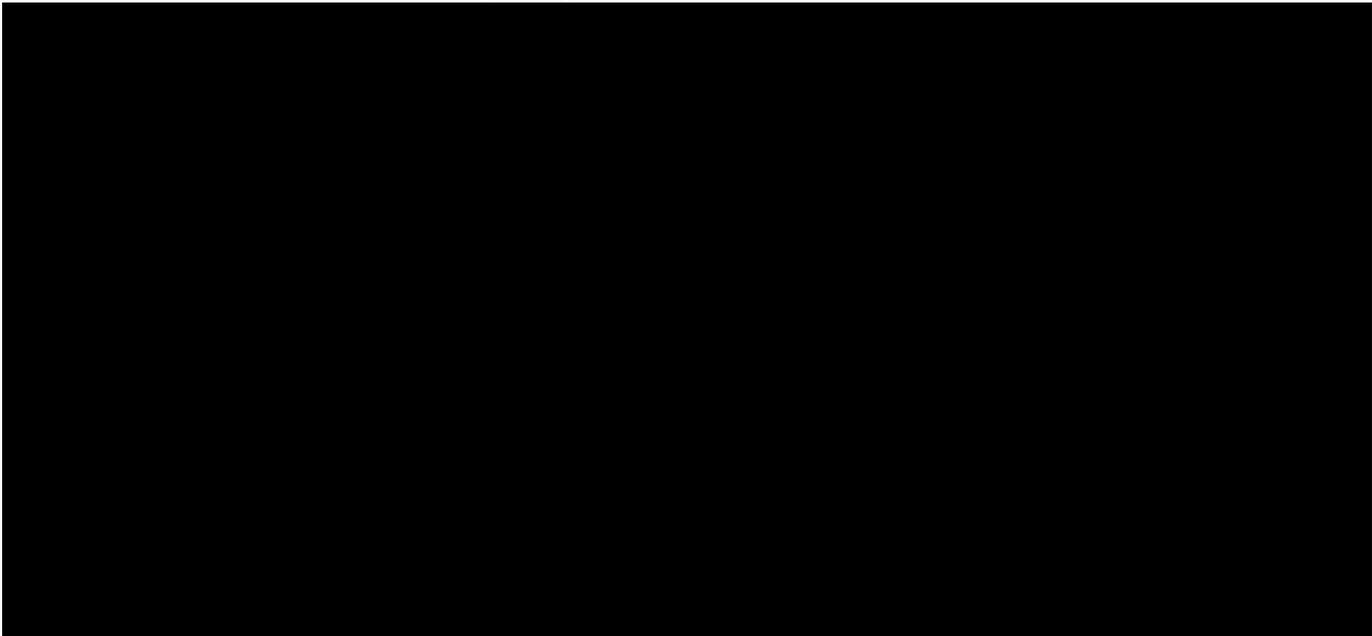
TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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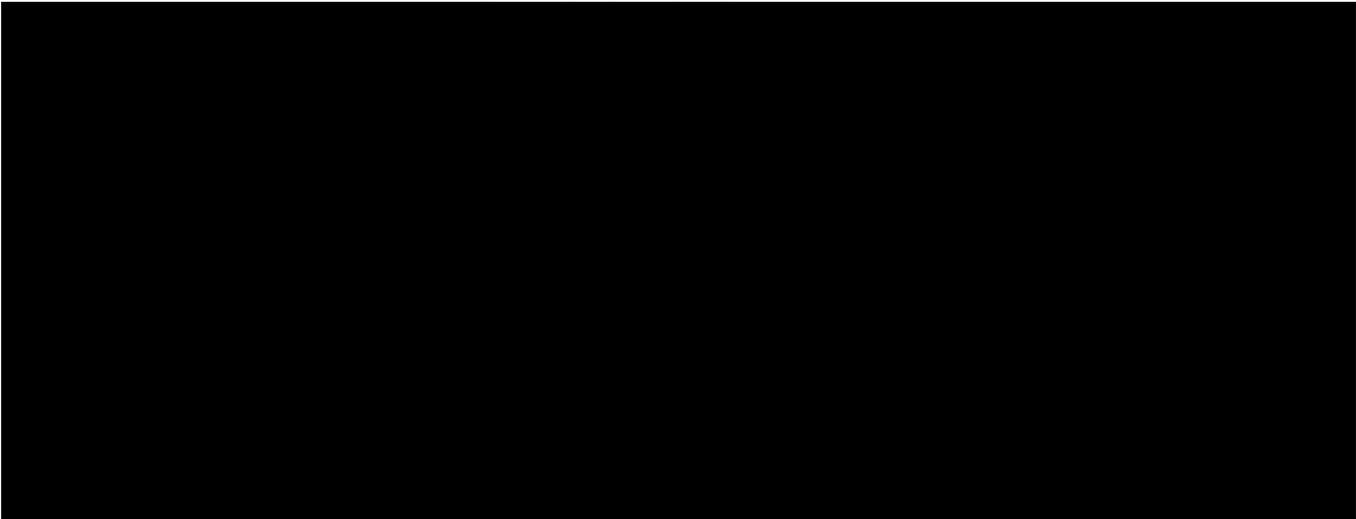


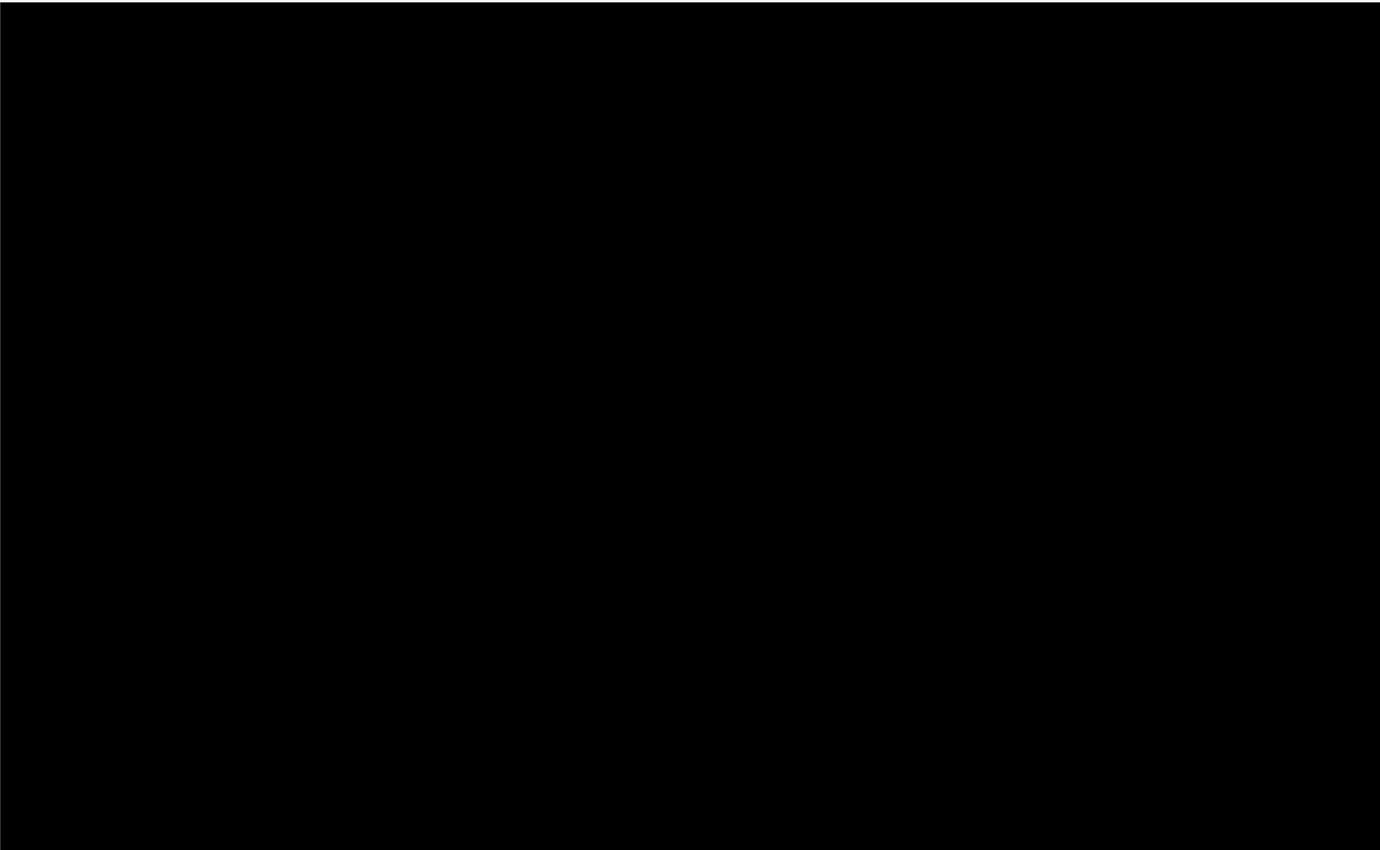


01/12/23	Kyle Ewing	Brief preliminary review of K. Dean's latest repetitive filing; email communication with G. Winkler, K. Hendricks, and C. Spaulding re: the same	0.10	34.00
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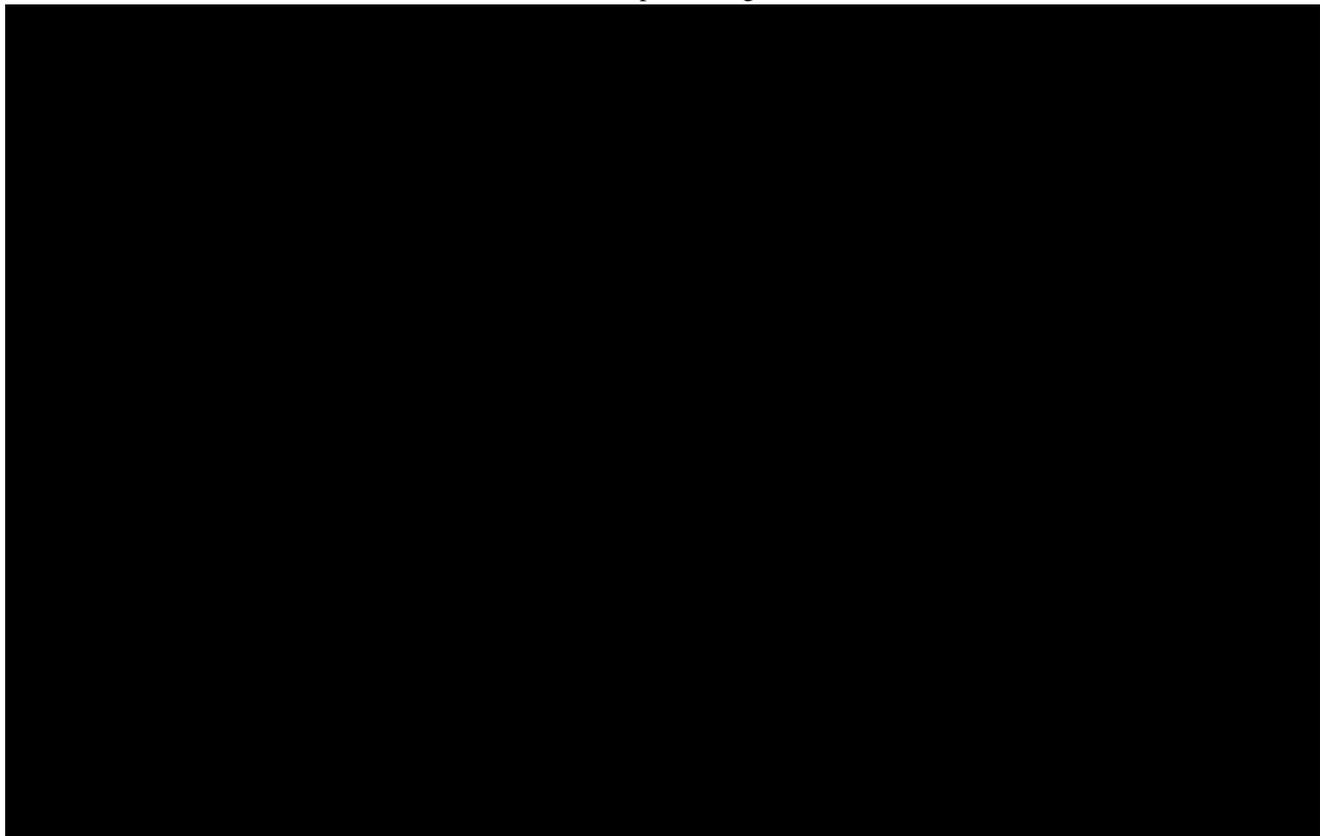


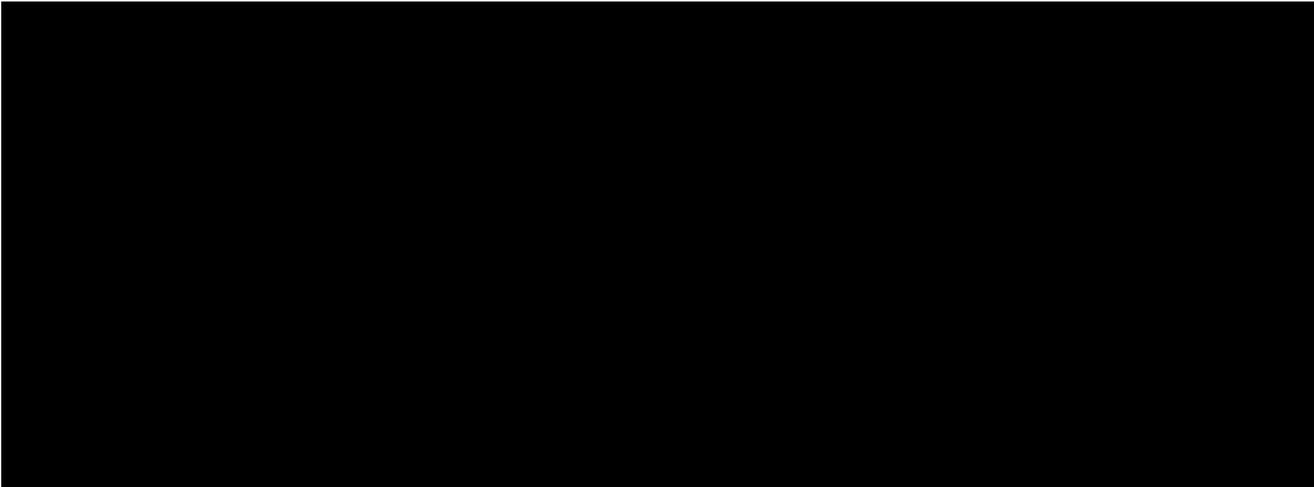
01/12/23	Christian Spaulding	Communications with team regarding most recent filing by Kamille Dean and avenue to respond thereto.	0.30	95.62
01/13/23	Kara B. Hendricks	Review new Dean objection/appeal relating to fee award and follow-up with C. Spaulding regarding response;	0.20	96.05



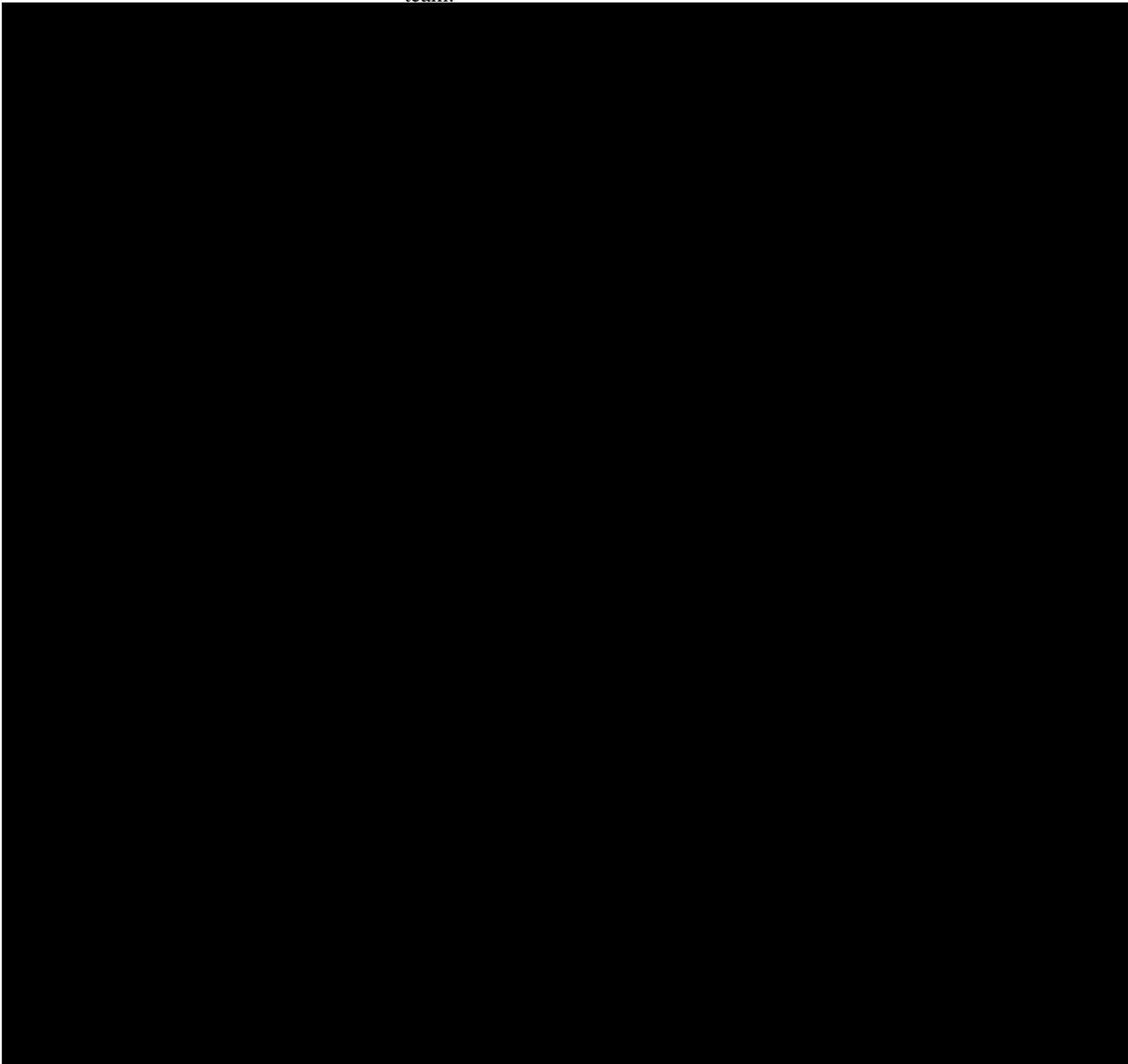


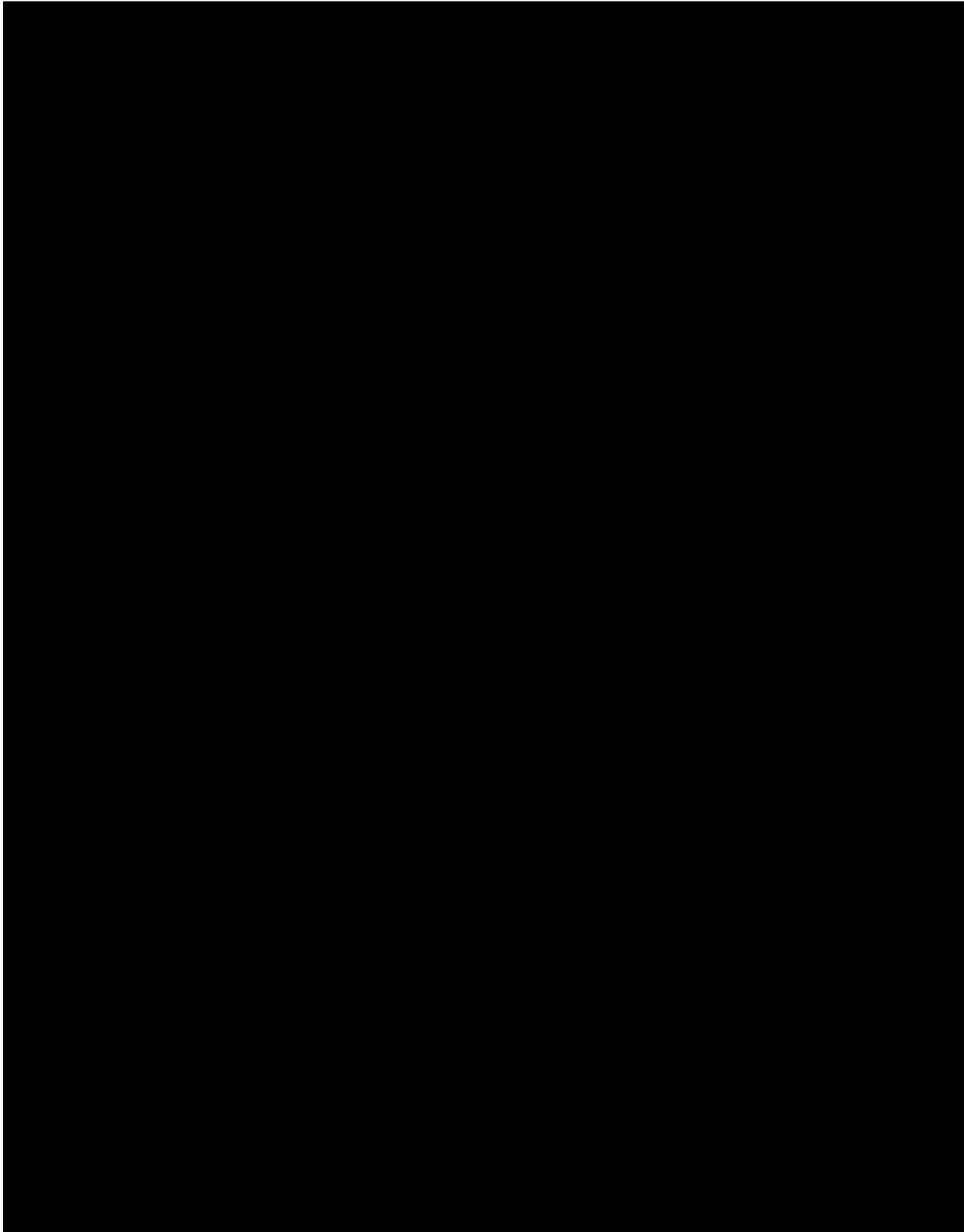
01/18/23	Christian Spaulding	Evaluate K. Dean's Objection to Magistrate 12/29/22 Order and begin draft of Response thereto.	5.30	1,689.37
01/18/23	Christian Spaulding	Review authority cited by Kamille Dean for applicability to the instant matter. Review Dean's prior filings.	2.70	860.62





01/19/23	Christian Spaulding	Evaluate docket and Dean's prior filings. Determine that Dean's prior filings contained same arguments made in present Objection. Draft overview of the same for team.	2.30	733.12
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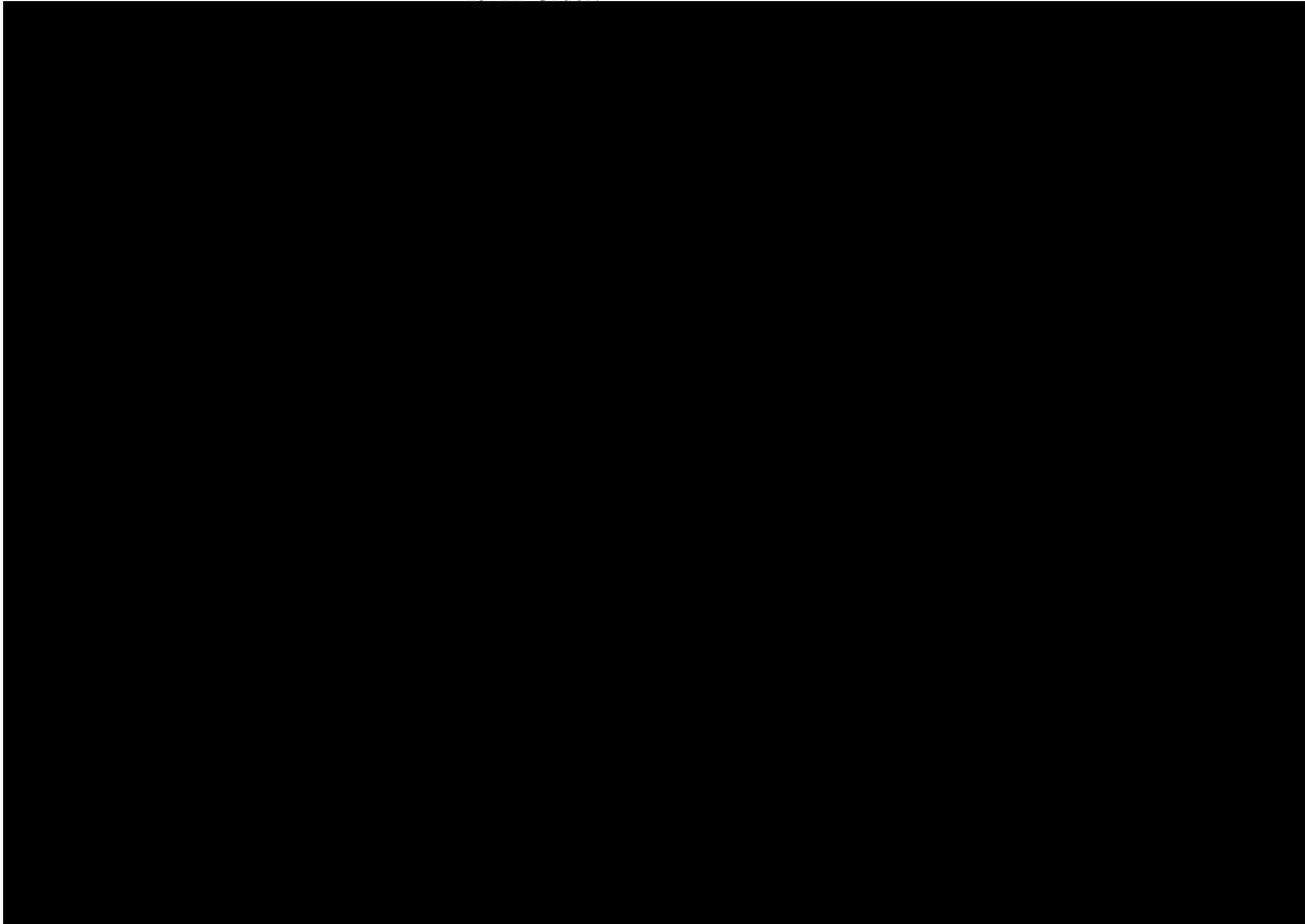




Magistrate Order and draft response thereto.

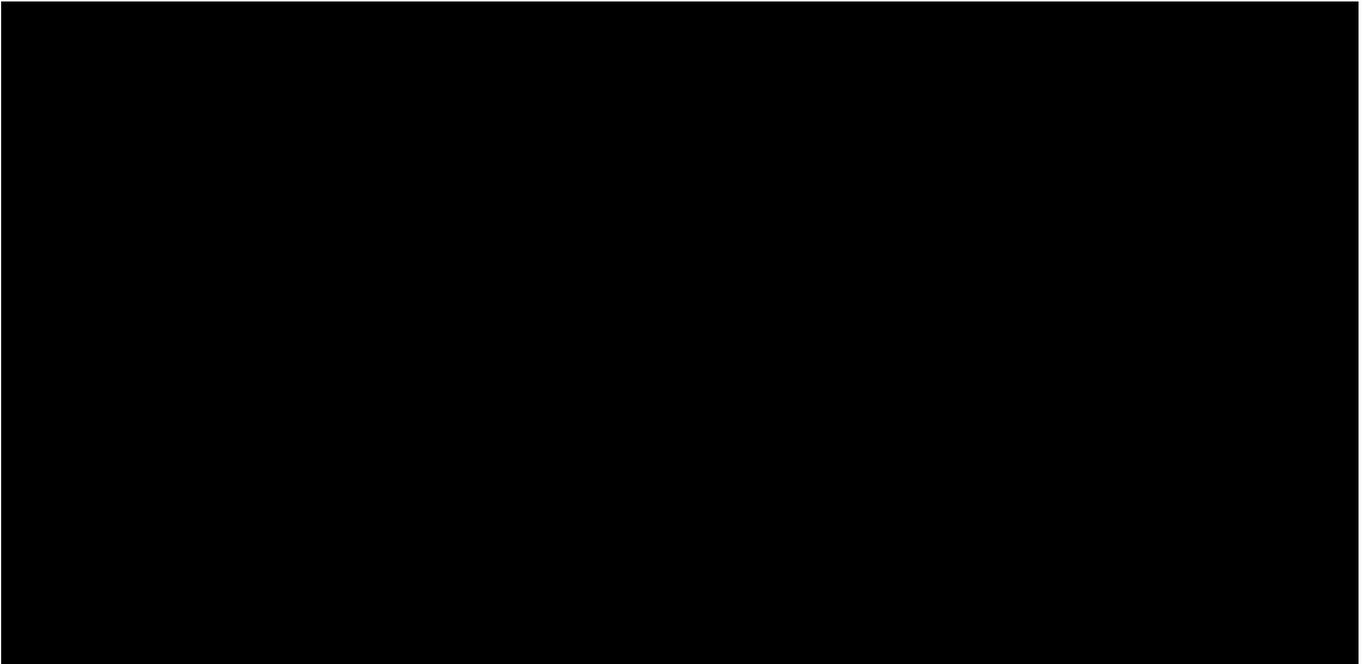


01/24/23	Kara B. Hendricks	Review and revise response to objection filed by Dean regarding fee award and follow-up with C. Spaulding regarding same;	1.50	720.38
01/24/23	Christian Spaulding	Continue and finalize draft of Response to Kamille Dean Objection to Magistrate 12-29-22 Order.	5.80	1,848.75





01/26/23 Kara B. Hendricks Follow-up with G. Winkler regarding 0.20 96.05
response to Dean appeal;



FEBRUARY
2023



Invoice No.: 1000246248
File No. : 209375.010100
Bill Date : March 8, 2023

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

Attn: Geoff Winkler

INVOICE

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

Legal Services through February 28, 2023:

Total Fees: \$ 35,912.78

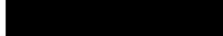
Expenses:

Business Meals -350.02
Local Travel 11.00
Service Company Charges 30.74
Information and Research 32.43

Total Expenses: \$ -275.85

Current Invoice: \$ 35,636.93

Previous Balance (see attached statement): \$ 

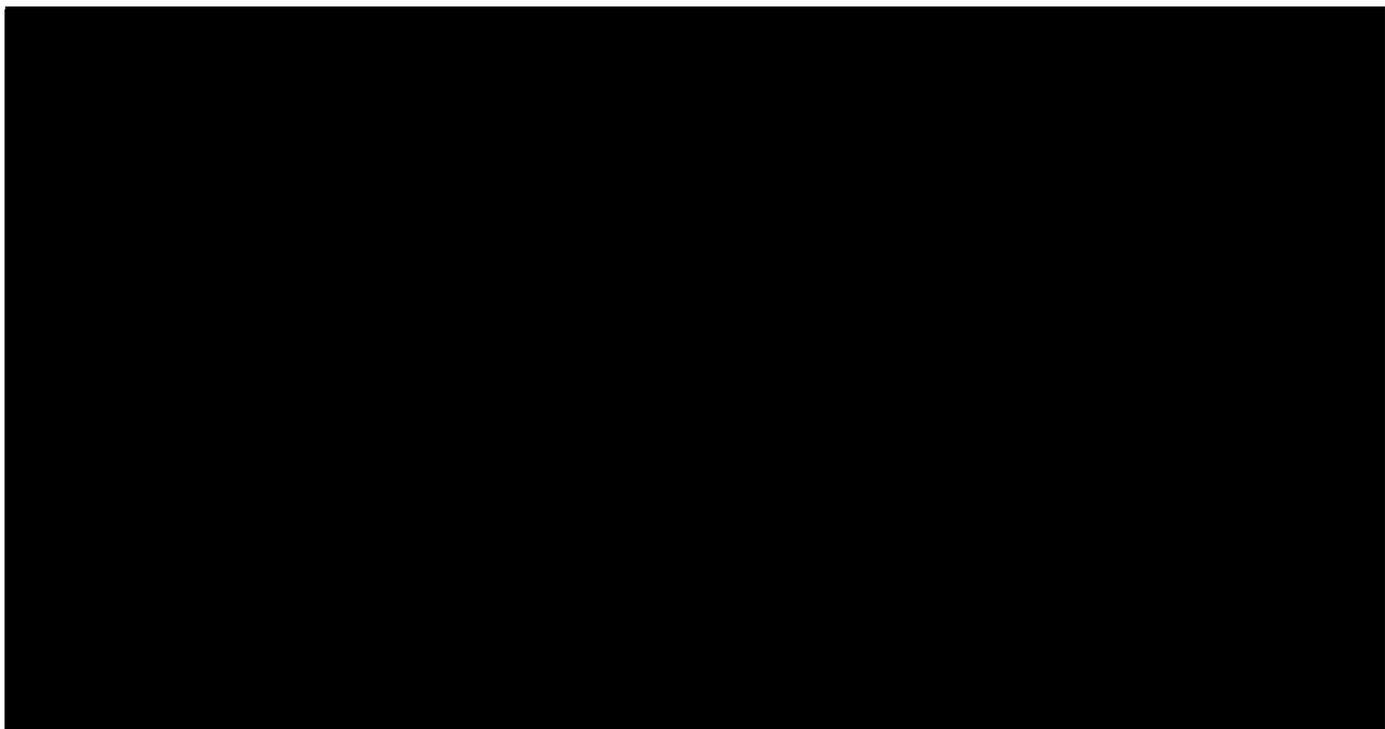
Total Amount Due: \$ 

KBH:LC
Tax ID: 13-3613083

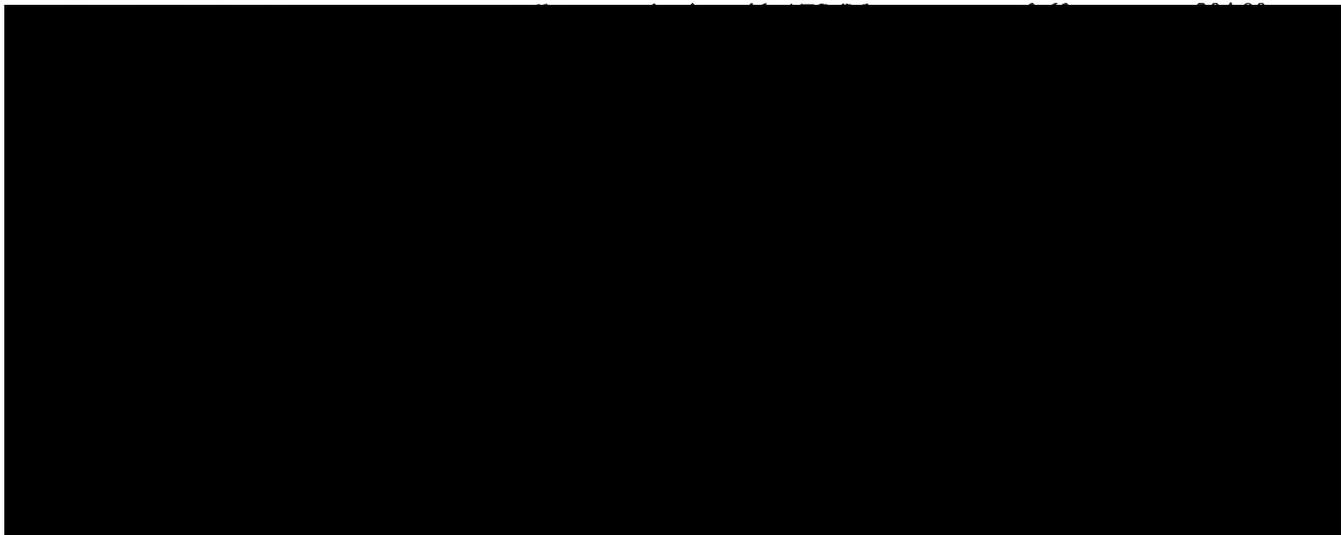
Description of Professional Services Rendered:

TASK CODE: GW001 ASSET ANALYSIS AND RECOVERY

DATE TIMEKEEPER DESCRIPTION HOURS AMOUNT

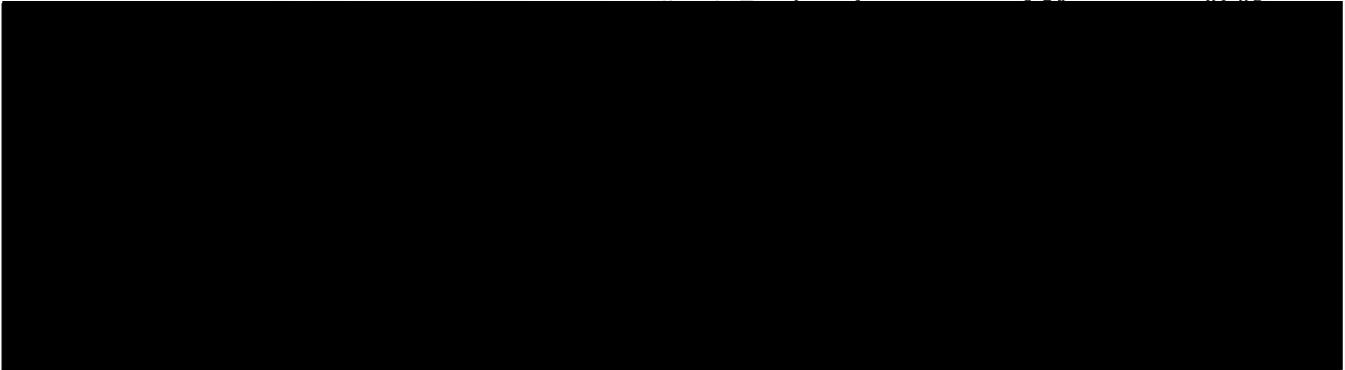


02/02/23	Christian Spaulding	Evaluate Kamille Dean Reply in Support of Objection to Magistrate 12-29-22 Order and email to team regarding the lack of merit in the same.	0.70	223.12
02/03/23	Kyle Ewing	Email communication with K. Hendricks re: Court's minute order(s) setting K. Dean's objections for hearing during monthly status conference	0.10	34.00

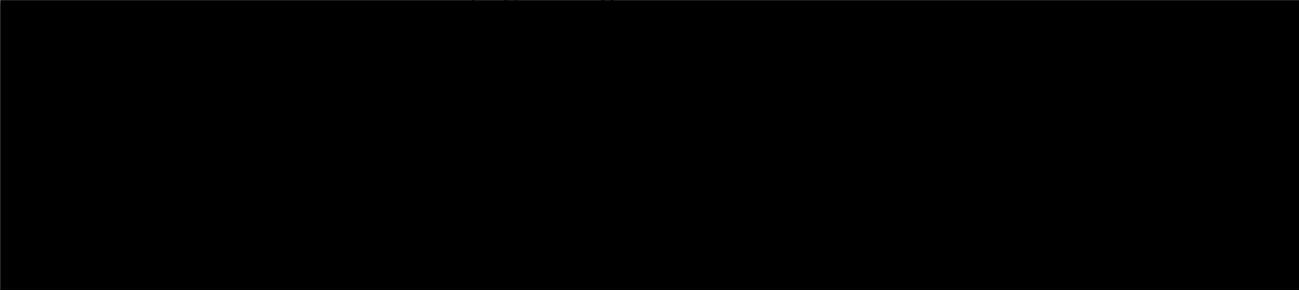




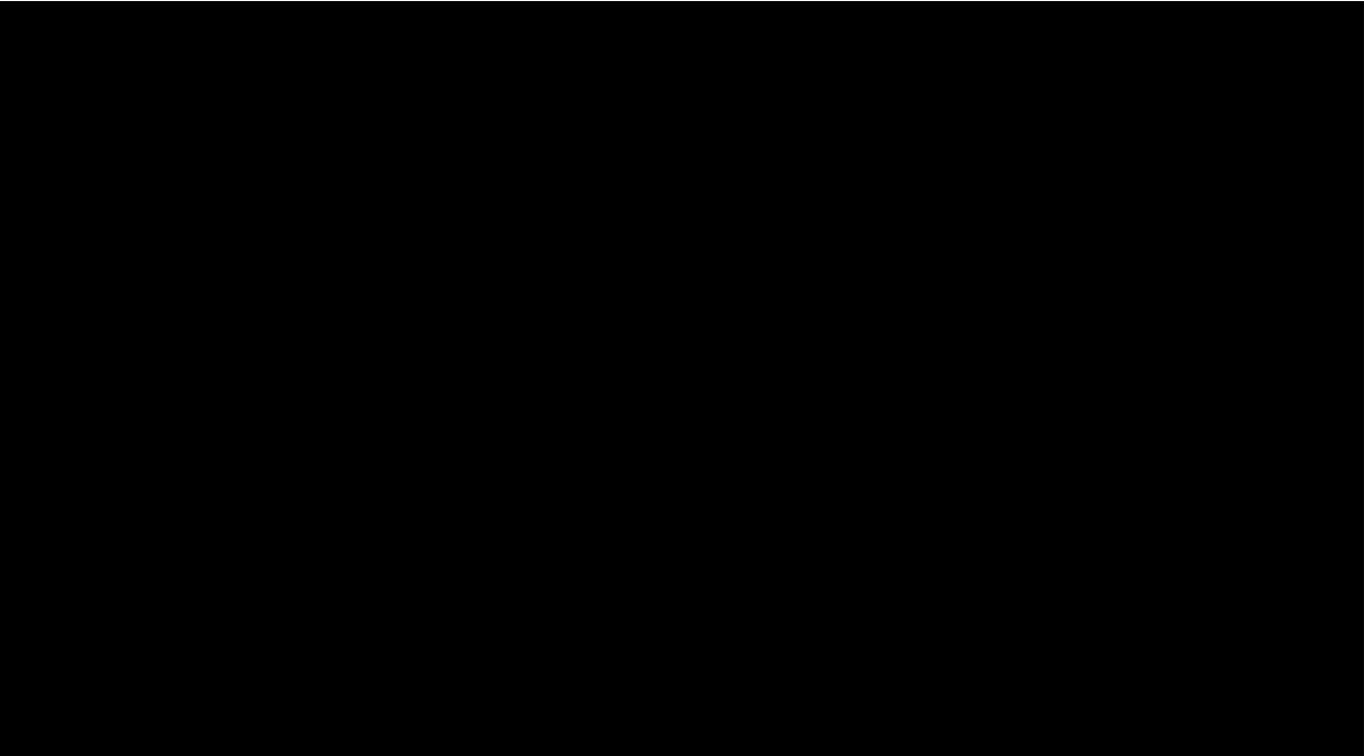
02/03/23	Kara B. Hendricks	Correspond with K. Ewing regarding Dean reply and upcoming hearing;	0.10	48.03
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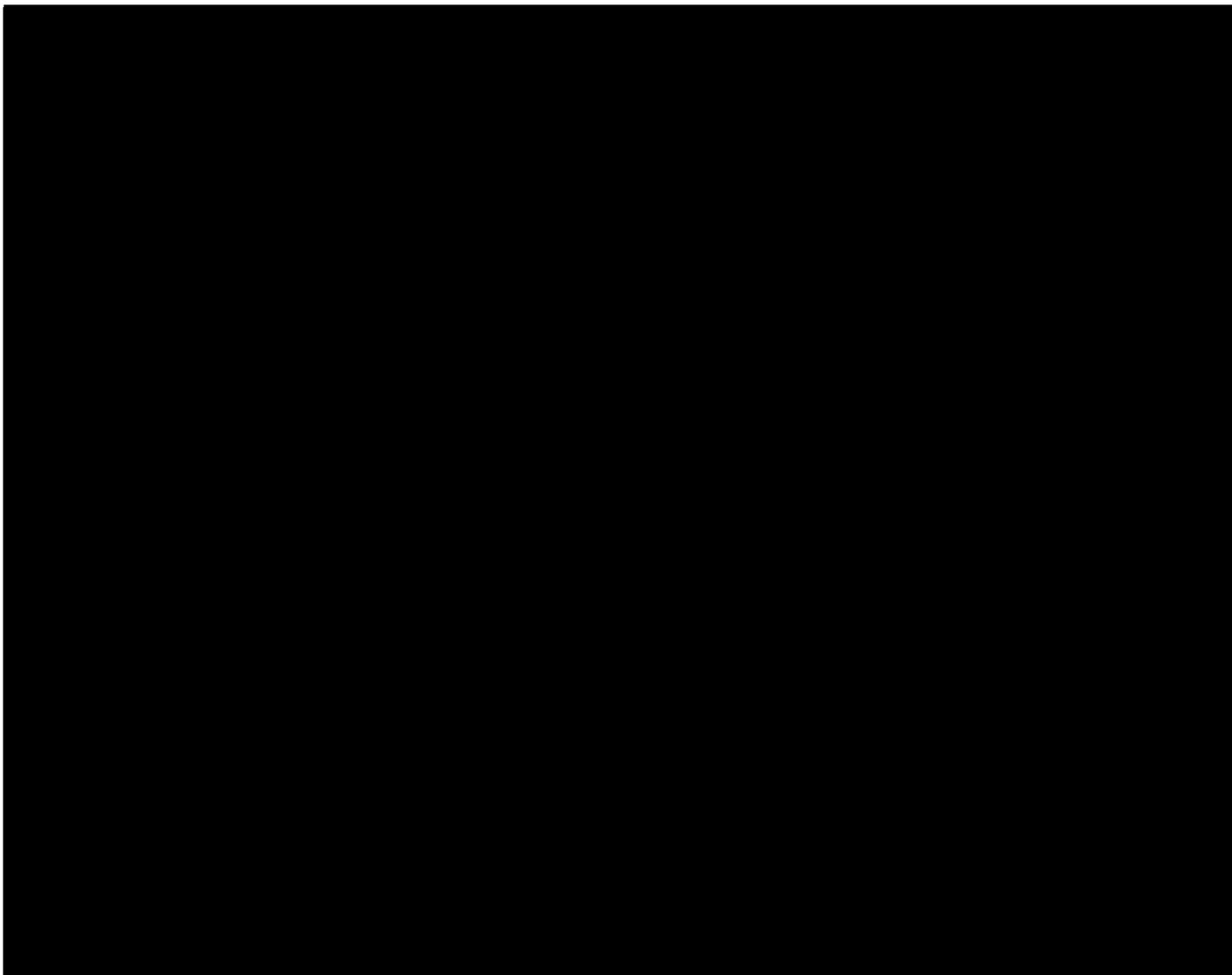


02/06/23	Kyle Ewing	Email communication with K. Dean and M. Jarosak re: next week's hearing on K. Deans objections/appeals of the magistrate judge's rulings	0.30	102.00
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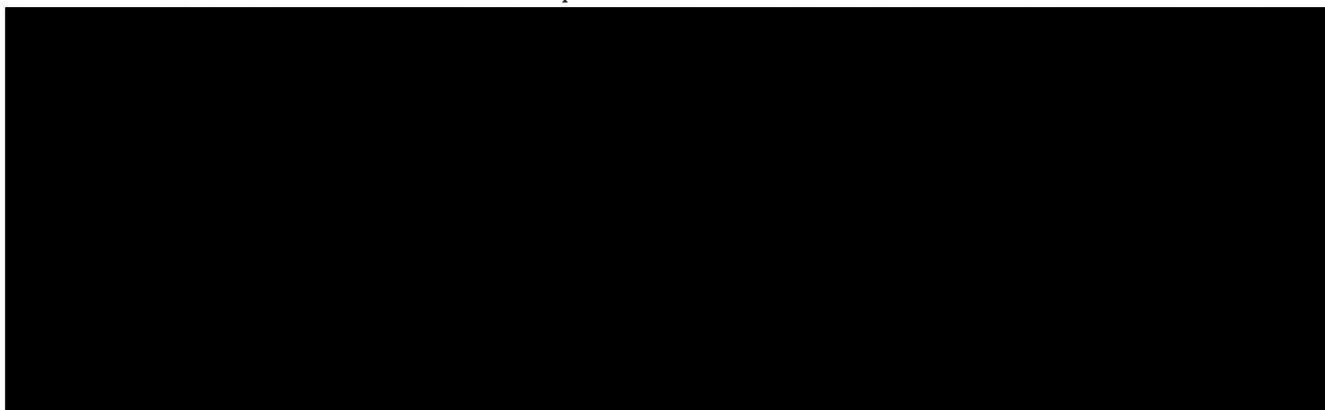


02/06/23	Kara B. Hendricks	Correspond via email with K. Dean regarding hearing;	0.10	48.03
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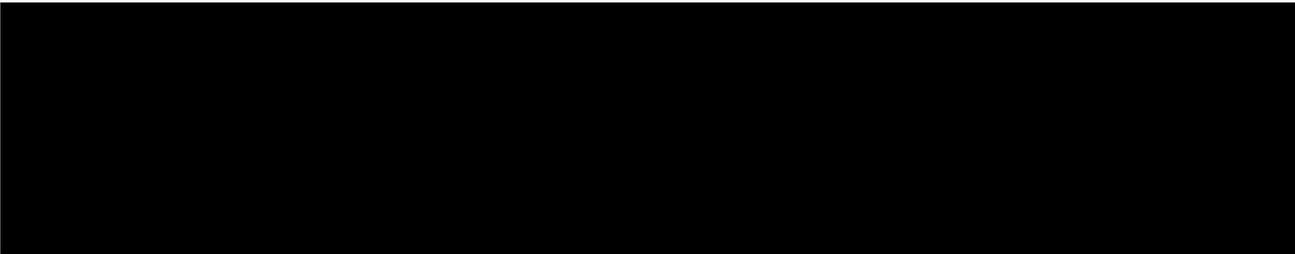


02/08/23	Kyle Ewing	Plan and prepare for next week's hearing on K. Dean's appeals of magistrate judge orders; confer with K. Hendricks re: previous research associated with the same; follow-up research	1.20	408.00
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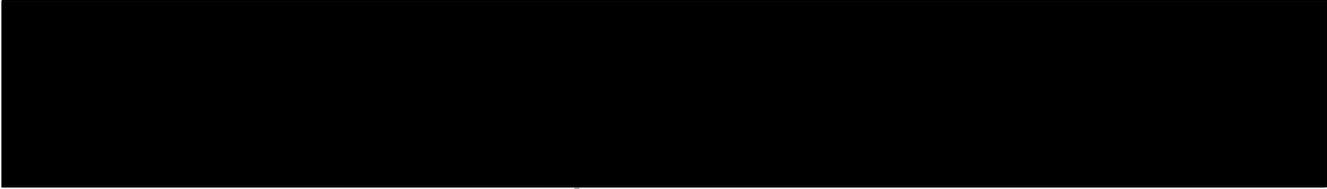


02/08/23	Kara B. Hendricks	Respond to email from K. Dean regarding upcoming hearing;	0.20	96.05
02/08/23	Kara B. Hendricks	Attention to minute order regarding status hearing and forward to K. Dean;	0.10	48.03

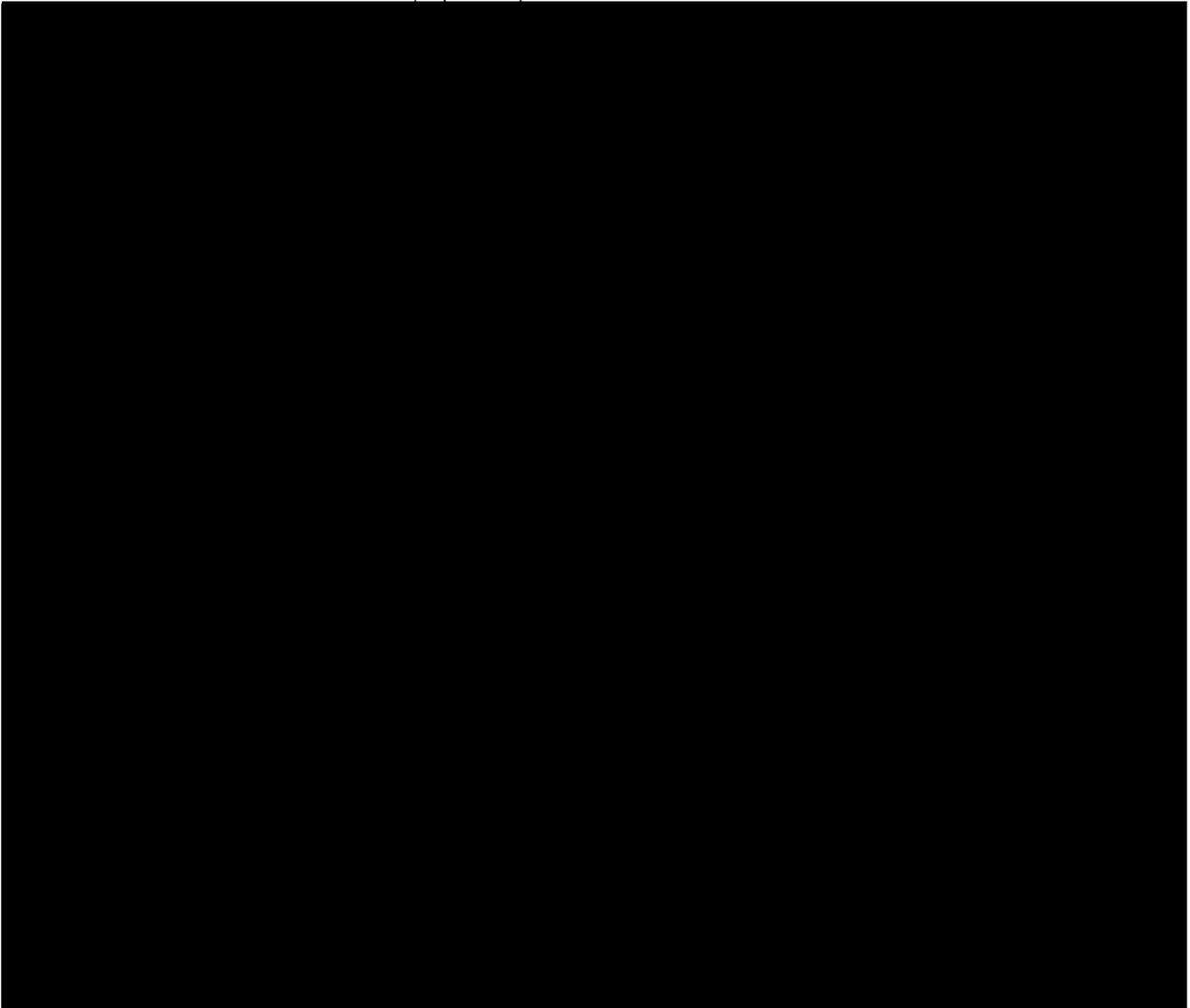




02/13/23	Kyle Ewing	Continue planning and preparing for Wednesday's hearing on K. Dean motions and status check with K. Hendricks	0.10	34.00
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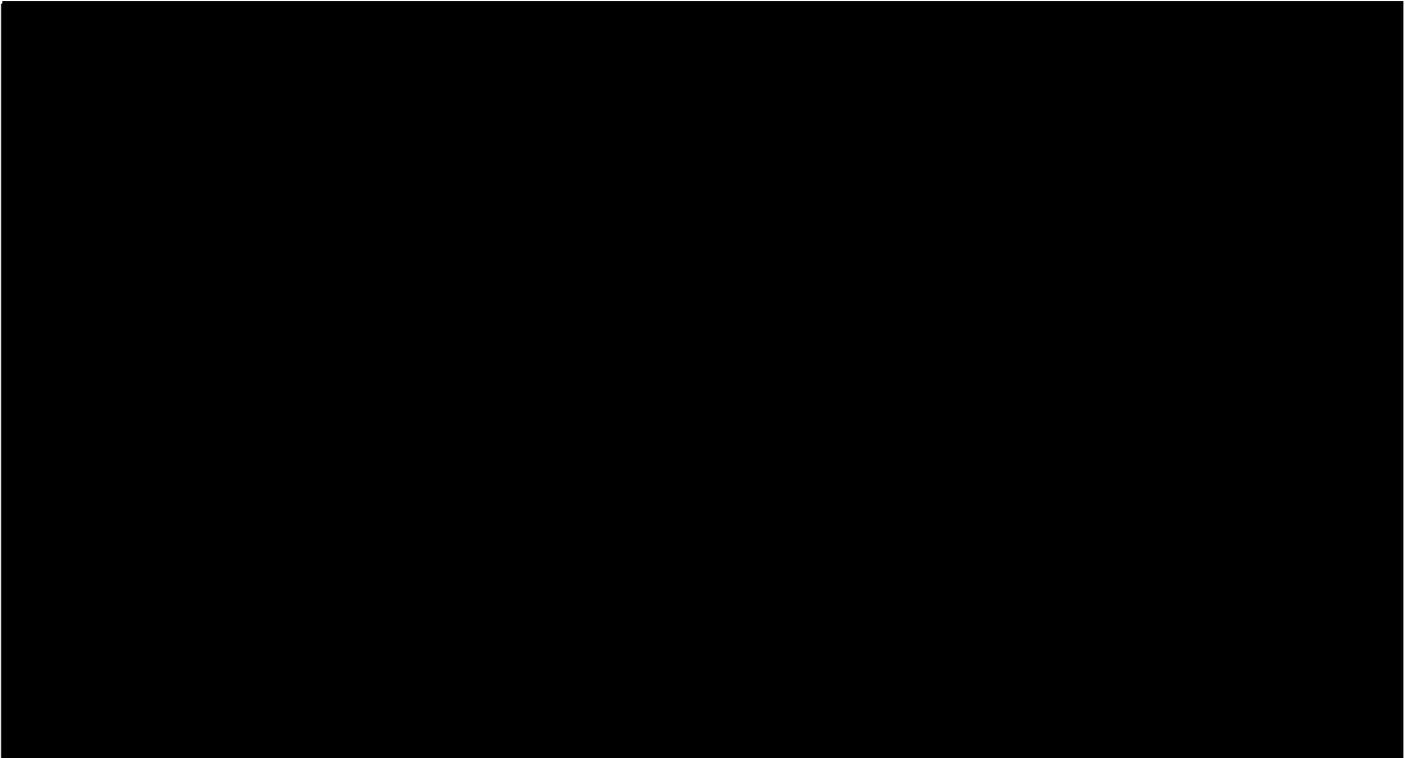


02/13/23	Kara B. Hendricks	Identify documents to review in preparation for hearing on Dean Objections/appeals and request E. Escobar-Gaddi compile same for review and hearing preparation;	0.20	95.71
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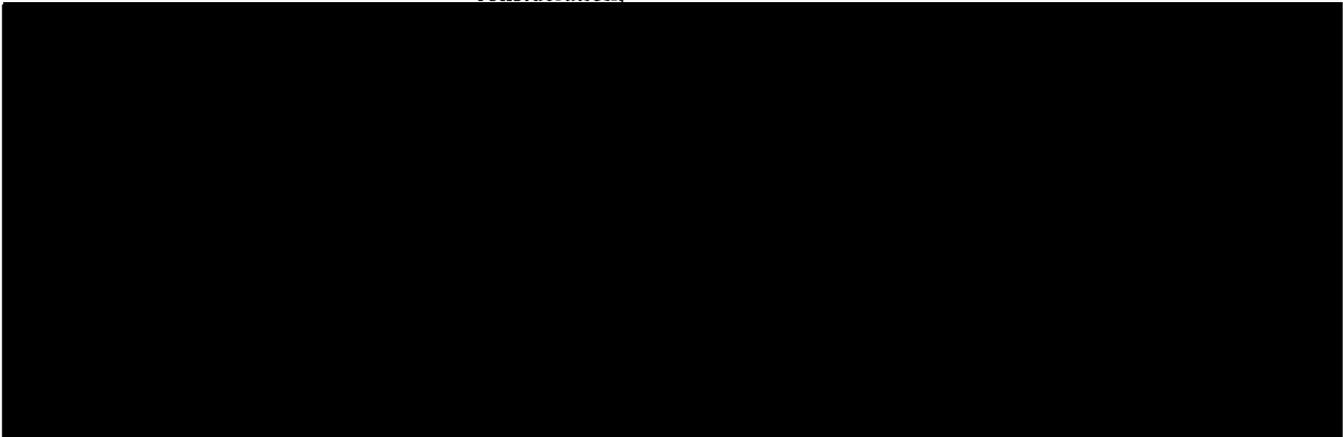
02/14/23	Kara B. Hendricks	Review pleadings and prepare for hearing regarding Dean motions;	1.20	576.30
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02/15/23	Kara B. Hendricks	Review payment proposal from K. Dean and forward to G. Winkler;	0.10	48.03
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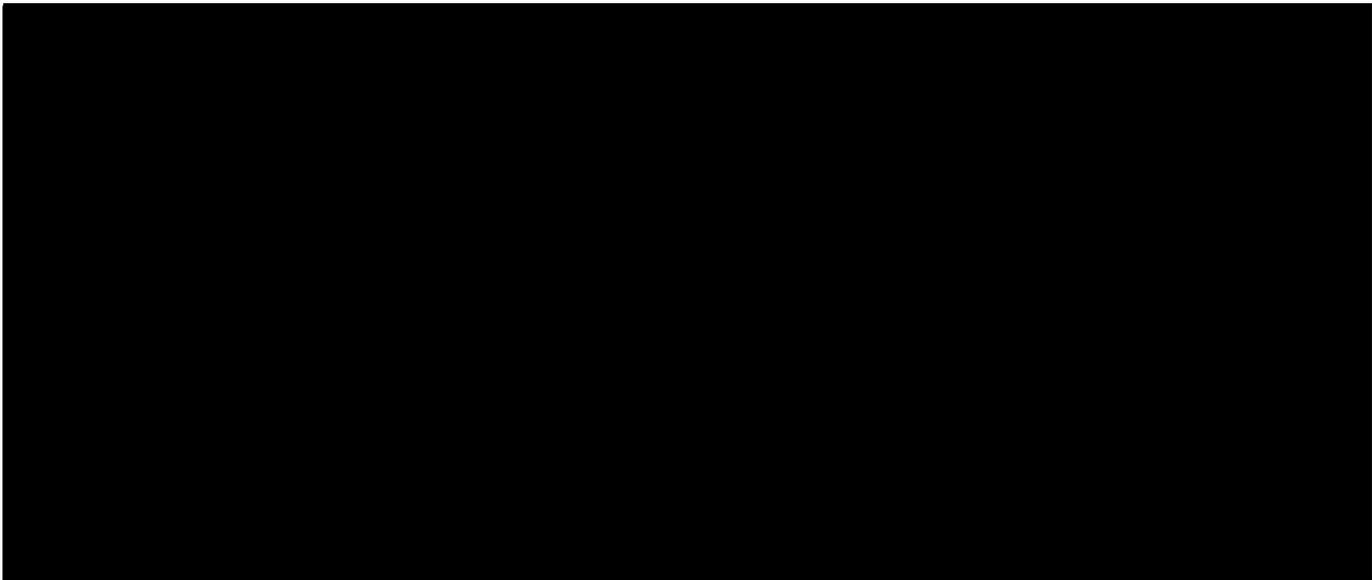


02/15/23	Kara B. Hendricks	Attention to email communication from K. Dean and forward to G. Winkler for consideration;	0.10	48.03
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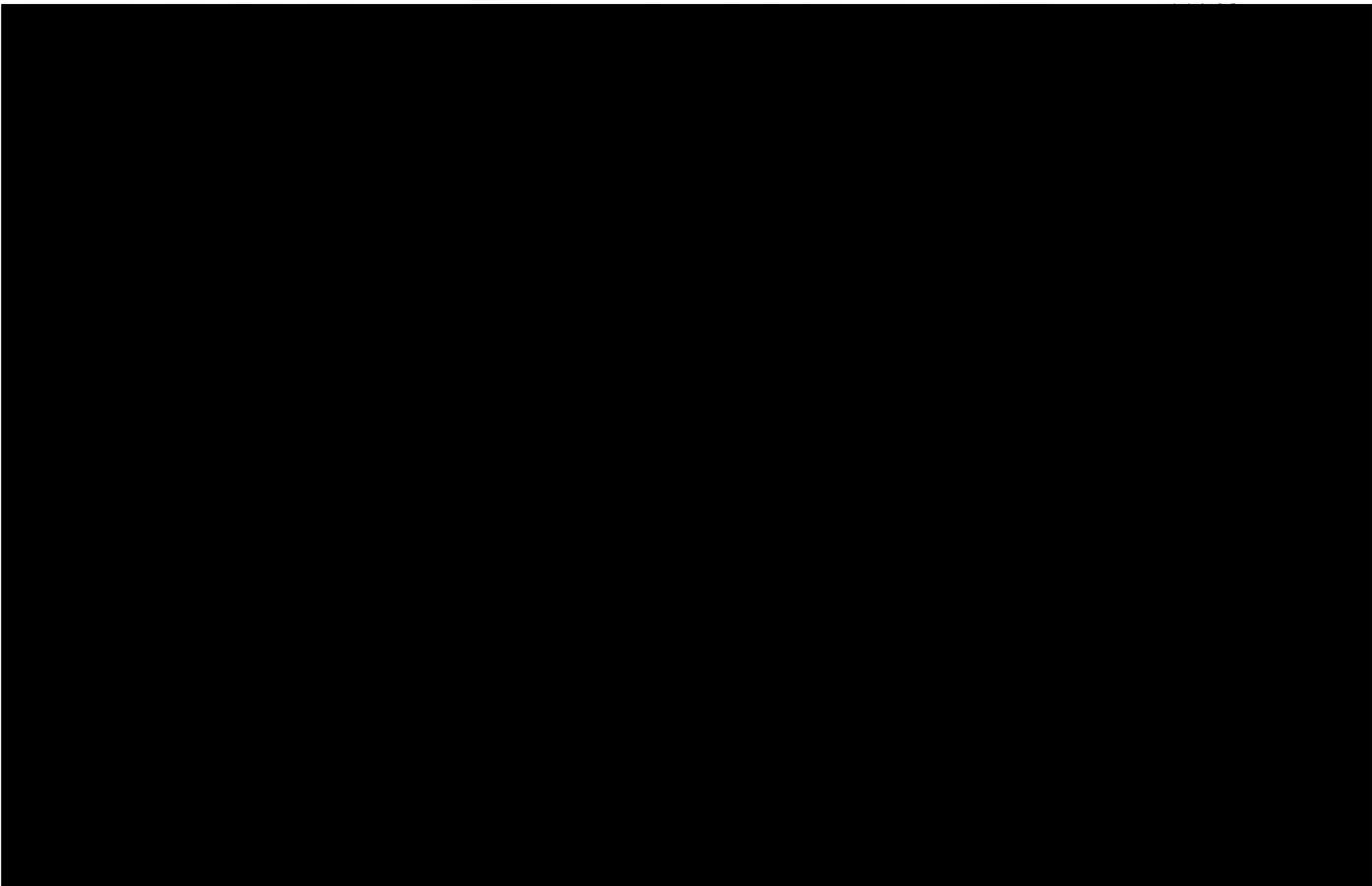


TASK CODE: GW004 CASE ADMINISTRATION

DATE TIMEKEEPER DESCRIPTION HOURS AMOUNT



02/15/23	Kara B. Hendricks	Prepare for status check and hearing on Dean Motions (2.7); [REDACTED]	4.20	2,017.05
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MARCH
2023

DATE PRINTED: 03/10/23 10:47
 BILL-THRU DATE: 03/10/23
 MATTER NO.: 209375.010100
 PREBILL . BA 13218733.KBD

PREBILL MEMO # 13218733

Fee Rate Set: GEOFFWINKL
 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 and Jennifer Rohrbach (make rate \$175 w no additional 15%). All Paralegals rate is \$175.00 Give invoices to Kara Hendricks. Do not post until her approval. She will email the client - LC 10/3 Print in format BKCYTASK_3 - LC

	Rates at Stdard (Rate1) Valuation	Rates This File Discnts or Special Rates applied	
unbilled fees \$ thru 03/10/23	17,200.50	15,395.00	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 03/10/23		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 \$		██████████	
retainer A/R \$		0.00	
-			
moneys on hand		(0.00)	trust balance: \$ _____ 0.00 Send Outstanding Invoice Report?
=			
total invested \$		██████████	apply to bill: <input type="checkbox"/> yes \$ _____ <input type="checkbox"/> no <input type="checkbox"/> yes <input type="checkbox"/> no

DATE PRINTED: 03/10/23 10:48
 BILL-THRU DATE: 03/10/23
 MATTER NO.: 209375.010100
 PREBILL . BA 13218733.KBD

PREBILL MEMO # 13218733

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

TIME DETAIL THROUGH 03/10/23

<u>DATE</u>	<u>TKPR</u>	<u>ACTUAL HOURS</u>	<u>STD RATE</u>	<u>MATTER RATE</u>	<u>MATTER DOLLARS</u>	<u>LC</u>	<u>WORK DESCRIPTION</u>	<u>ACTION CODE</u>	<u>ENTRY #</u>
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03/01/23	KBH	0.20	610.00	565.00	113.00		Review order denying Dean motion for reconsideration and awarding fees and request C. Spaulding's assistance with preparation of memo of costs;	X	219583978
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DATE PRINTED: 03/10/23 10:48
BILL-THRU DATE: 03/10/23
MATTER NO.: 209375.010100
PREBILL . BA 13218733.KBD

PREBILL MEMO # 13218733

FILE RESPONSIBILITIES

CLIENT - 209375

Winkler, Geoff

Billing Atty: Kara B. Hendricks

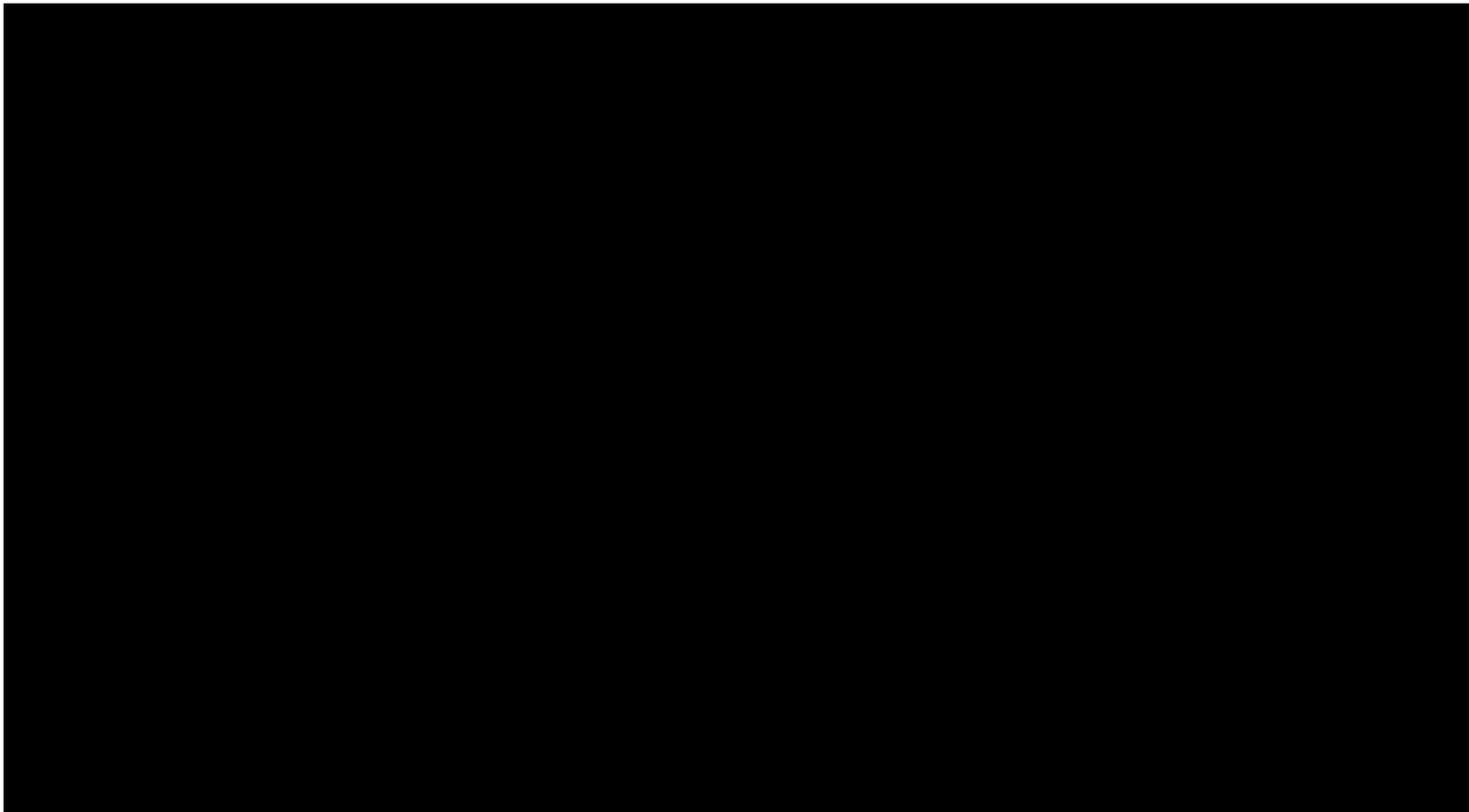
MATTER -
209375.010100

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



03/08/23	KBH	0.30	610.00	565.00	169.50	Review information to include with memo of costs relating to Dean appeals/objections and follow-up with C. Ney regarding same;	X	219609761
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DATE PRINTED: 03/10/23 10:48
 BILL-THRU DATE: 03/10/23
 MATTER NO.: 209375.010100
 PREBILL . BA 13218733.KBD

PREBILL MEMO # 13218733

FILE RESPONSIBILITIES

CLIENT - 209375

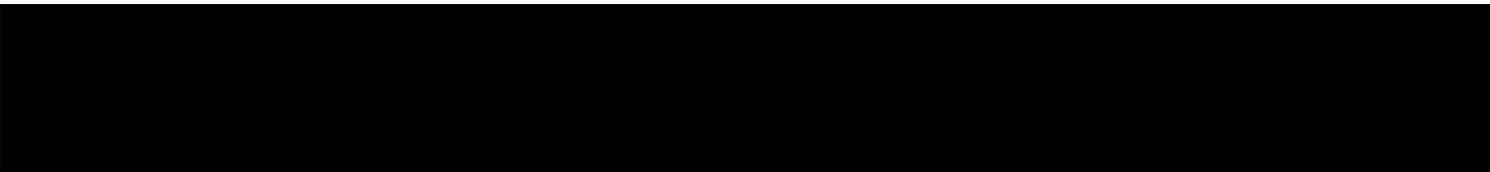
Winkler, Geoff

Billing Atty: Kara B. Hendricks

**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

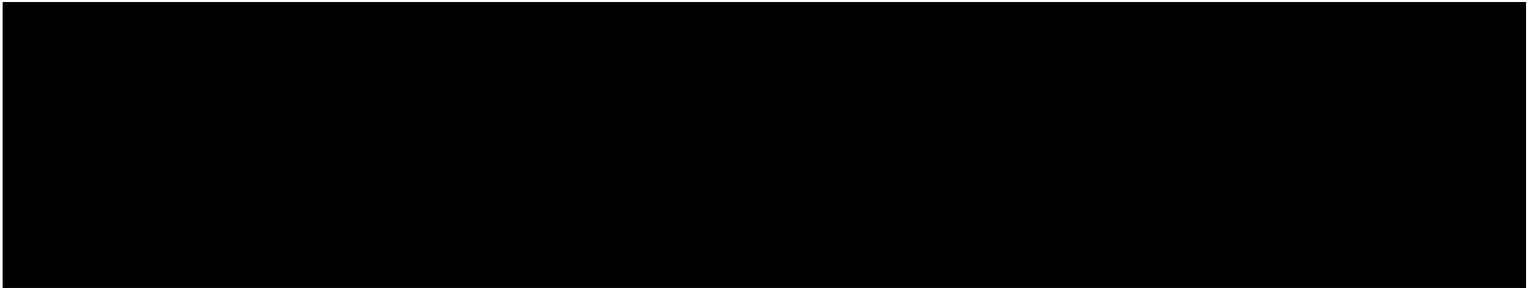
Resp. Atty: Kara B. Hendricks



03/08/23	CLN	3.70	295.00	295.00	1,091.50	Analysis of billings and redact time entries not applicable to motion for fees regarding Dean's reconsideration, complete spreadsheet of hours and fees for entry into Motion (3.4); communications with K.Hendricks and C.Spaulding regarding same (.3).	X	219607403
03/08/23	CS	0.50	395.00	375.00	187.50	Communications with team regarding invoices and charges related to Objections filed by Kamille Dean pursuant to Court's order.	X	219612790
03/08/23	CS	2.50	395.00	375.00	937.50	Evaluate order affirming magistrate judge's orders. Review billing entries related to Response to K. Dean Objection and begin draft of Memorandum of Fees related to the same.	X	219612823



03/09/23	KBH	0.10	610.00	565.00	56.50	Correspond with C. Spaulding regarding scope of memo of costs to address Dean	X	219609826
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DATE PRINTED: 03/10/23 10:48
 BILL-THRU DATE: 03/10/23
 MATTER NO.: 209375.010100
 PREBILL . BA 13218733.KBD

PAGE 10

PREBILL MEMO # 13218733

FILE RESPONSIBILITIES

CLIENT - 209375

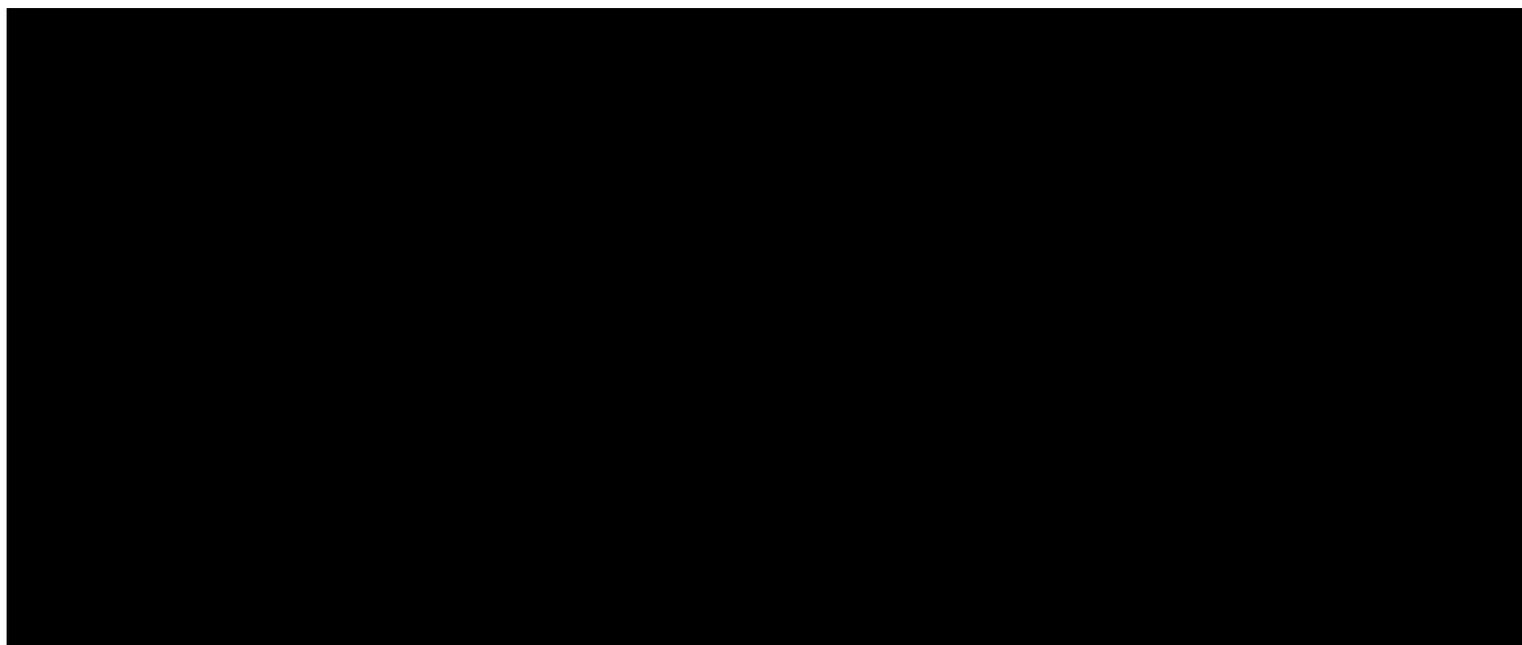
Winkler, Geoff

Billing Atty: Kara B. Hendricks

**MATTER -
209375.010100**

SEC v. Beasley (Geoff Winkler, Receiver)

Resp. Atty: Kara B. Hendricks



03/09/23	CS	4.10	395.00	375.00	1,537.50	Continue draft of Memorandum of Fees following Court's order in ECF No. 473 for those fees incurred in responding to K. Dean's objections.	X	219612815
03/09/23	CS	0.40	395.00	375.00	150.00	Revise Memorandum of fees regarding Kamille Dean Objections per comments by K. Hendricks and confer with team regarding the same.	X	219612837
03/09/23	CS	0.70	395.00	375.00	262.50	Begin draft of declaration of Kara Hendrick ISO Memorandum of Fees related to Ms. Dean's Objections	X	219612860
03/10/23	KE	0.70	450.00	400.00	280.00	Finalize draft memorandum of fees and costs in preparation for filing, including final review/edits to the brief and communication with GT team re: filing the same	X	219612900

TOTAL HOURS:

TOTAL STANDARD DOLLAR VALUE:

TOTAL MATTER DOLLAR VALUE:

 \$ _____