

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

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 TRAURIG, LLP**
5 10845 Griffith Peak Drive, Suite 600
6 Las Vegas, Nevada 89135
7 Telephone: (702) 792-3773
8 Facsimile: (702) 792-9002

9 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com

10 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com

11 **SEMENZA KIRCHER RICKARD**
12 10161 Park Run Drive, Suite 150
13 Las Vegas, Nevada 89145
14 Telephone: (702) 835-6803
15 Facsimile: (702) 920-8669

16 *Attorneys for Receiver, Geoff Winkler*

DAVID R. ZARO*

dzaro@allenmatkins.com

JOSHUA A. del CASTILLO*

jdelcastillo@allenmatkins.com

MATTHEW D. PHAM*

mpham@allenmatkins.com

*admitted *pro hac vice*

ALLEN MATKINS LECK GAMBLE

MALLORY & NATSIS LLP

865 South Figueroa Street
Suite 2800

Los Angeles, California 90017-2543

Telephone: (213) 622-5555

Facsimile: (213) 620-8816

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE DISTRICT OF NEVADA**

19 SECURITIES AND EXCHANGE
20 COMMISSION,

Plaintiff,

vs.

21 MATTHEW WADE BEASLEY, *et al.*,

Defendants,

22 THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

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

**STIPULATION AND [PROPOSED]
ORDER FOR NON-PARTY
KAMILLE DEAN'S PAYMENT OF
FEES AND COSTS**

23
24
25 Court appointed receiver Geoff Winkler ("Receiver") by and through his counsel of
26 record, the law firm of Greenberg Traurig, LLP and non-party Kamille Dean hereby stipulate as
27 follows:

28 ///

1 1. On August 1, 2022, the Receiver filed a Motion to Compel or Alternative Motion
2 for Order to Show Cause Why Kamille Dean Should Not be held in Contempt for Failure to
3 Comply with This Court’s Order (the “Motion to Compel”). ECF No. 210.

4 2. On November 17, 2022 the Court entered an Order granting the Receiver’s
5 Motion to Compel. ECF No. 368. In granting the Receiver’s Motion to Compel, the Court
6 awarded the Receiver the attorneys’ fees and costs associated with bringing and succeeding on
7 the Motion to Compel. *Id.*

8 3. On December 1, 2022, the Receiver submitted his Memorandum of Fees and
9 Costs relating to the Motion to Compel. ECF No. 378.

10 4. On December 29, 2022, the Court entered an Order granting the Receiver’s
11 Memorandum of Fees and Costs in the amount of \$33,755.24 (the “Motion to Compel Fee
12 Award”). ECF No. 417.

13 5. On January 12, 2023, Ms. Dean filed an Objection, Request for De Novo Review,
14 and Appeal from Magistrate’s 12-29-22 Order (the “Objection”).

15 6. On March 1, 2023, the Court entered an Order Affirming Magistrate Judge’s
16 Orders, denying Ms. Dean’s Objection and granting the Receiver’s request for additional
17 attorneys’ fees incurred in responding to Ms. Dean’s objections. ECF No. 473.

18 7. On March 10, 2023, the Receiver submitted his Memorandum of Fees and Costs
19 relating to his response to Ms. Dean’s Objection seeking fees in the amount of \$32,803.61 (the
20 “Second Fee Memorandum”). ECF No. 481.

21 8. As of the date of this stipulation, the Court has not yet ruled on the Receivers
22 Second Fee Memorandum. However, Ms. Dean is willing to stipulate to the amount due and the
23 payment schedule set forth below.

24 9. Through the Motion to Compel Fee award and the Objection Fee Memorandum,
25 Ms. Dean is to pay the Receiver \$66,558.85.

26 10. As of the date of this stipulation, Ms. Dean has paid the receiver ten thousand
27 dollars (\$10,000.00).

28 ///

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

1 WHEREAS, the Receiver and Ms. Dean have reached an agreement to facilitate
 2 Ms. Dean’s payment of the outstanding amounts due under the Motion to Compel Fee Award
 3 and the Second Fee Memorandum, totaling fifty-six thousand five hundred fifty-eight dollars
 4 and eighty five cents (\$56,558.85) (the “Outstanding Balance”). The terms of the Receiver and
 5 Ms. Dean’s agreement are as follows:

6 1. Ms. Dean will pay the remaining \$23,755.24 due pursuant to the Order entered
 7 on the Motion to Compel Fee Award by March 31, 2023.

8 2. Ms. Dean will stipulate to paying the Receiver the \$32,803.61 requested in the
 9 “Second Fee Memorandum” by making six (6) equal monthly installments as set forth in the
 10 payment schedule below (the “Payment Schedule”).

PAYMENT SCHEDULE	
PAYMENT DATE	PAYMENT AMOUNT
May 1, 2023	\$ 5,467.27
June 1, 2023	\$ 5,467.27
July 1, 2023	\$ 5,467.27
August 1, 2023	\$ 5,467.27
September 1, 2023	\$ 5,467.27
October 1, 2023	\$ 5,467.26
TOTAL	\$32,803.61

11
 12
 13
 14
 15
 16
 17
 18
 19
 20 3. In entering into this stipulation, the Receiver reserves all rights to pursue any and
 21 all claims against Ms. Dean in the event Ms. Dean fails to comply with the payment terms
 22 established herein.

23 4. Through this stipulation, the Receiver requests this Court refrain from ruling on
 24 and/or vacate the pending Second Memorandum of Fees (ECF No. 481).

25 5. The Receiver and Ms. Dean stipulate and agree, in the event Ms. Dean violates
 26 the terms of this Stipulation, the Receiver shall re-new his memorandum of fees to include any
 27 additional fees incurred through collection efforts and the drafting of any and all necessary
 28 correspondence and/or filings before this Court including, but not limited to, the drafting of any

1 motion related to the enforcement or collection of the fees contemplated herein, the response
2 and/or opposition to any filing made by Ms. Dean related to the fees contemplated herein, and
3 any and all administrative or filing fees associated therewith.

4 **ACCORDINGLY, IT IS SO STIPULATED AND AGREED:**

5 DATED this 29th day of March, 2023

DATED this 29th day of March, 2023

6 **KAMILLE DEAN**

GREENBERG TRAUERIG, LLP

7 By: */s/ Kamille Dean*

By: */s/ Kara B. Hendricks*

8 KAMILLE DEAN, ESQ.
9 4545 N. 36th Street, Suite 202
10 Phoenix, Arizona 85018
11 Telephone: 602.252.5601
12 Email: Kamille@kamilldean.com

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

**ALLEN MATKINS LECK
GAMBLE MALLORY & NATSIS
LLP**

DAVID R. ZARO, ESQ.*
JOSHUA A. del CASTILLO, ESQ.*
MATTHEW D. PHAM, ESQ.*
*admitted *pro hac vice*
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543

SEMENZA KIRCHER RICKARD

JARROD L. RICKARD, ESQ.
Nevada Bar No. 10203
KATIE L. CANNATA, ESQ.
Nevada Bar No. 14848
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

Attorneys for Receiver Geoff Winkler

24 ///
25 ///
26 ///
27 ///
28 ///

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

ORDER

Based on the foregoing, **IT IS HEREBY ORDERED** that the Stipulation of the Receiver and Ms. Dean is hereby approved:

A. Ms. Dean shall make payments to the Receiver in accordance with the Payment Schedule set forth herein;

B. The Court will refrain from ruling on the Receiver’s Memorandum of Fees and Costs Relating to Response to Non-Party Kamille Dean’s Objections From Magistrate Orders Pursuant to Order Affirming Magistrate Judge’s Orders. ECF No. 481;

C. In the event Ms. Dean violates the terms of this Stipulation, the Receiver shall re-new his memorandum of fees to include any additional fees incurred through collection efforts and the drafting of any and all necessary correspondence and/or filings before this Court including, but not limited to, the drafting of any motion related to the enforcement or collection of the fees contemplated herein, the response and/or opposition to any filing made by Ms. Dean related to the fees contemplated herein, and any and all administrative or filing fees associated therewith.

IT IS SO ORDERED.

The Honorable CRISTINA D. SILVA
Judge, United States District Court

DATED: _____

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