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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
Corporation; J&J CONSULTING SERVICES,  
INC., a Nevada Corporation; J AND J  
PURCHASING LLC; SHANE M. JAGER;  
JASON M. JONGEWARD; DENNY  
SEYBERT; ROLAND TANNER; LARRY  
JEFFERY; JASON A. JENNE; SETH  
JOHNSON; CHRISTOPHER M. MADSEN;  
RICHARD R. MADSEN; MARK A.  
MURPHY; CAMERON ROHNER; AND  
WARREN ROSEGREEN;

Defendants; and

THE JUDD IRREVOCABLE TRUST; PAJ  
CONSULTING INC; BJ HOLDINGS LLC;  
STIRLING CONSULTING, L.L.C.; CJ  
INVESTMENTS, LLC; JL2 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-JCM-EJY

**MOTION TO EXTEND DISCOVERY  
SCHEDULE (First Request)**

1 Plaintiff Securities and Exchange Commission (the “SEC”), pursuant to Local Rule 6-1,  
2 hereby moves to extend the discovery schedule and associated deadlines by seven months so as  
3 to allow the parties to efficiently discuss potential resolution of this action. This is the first  
4 motion to extend the time to take discovery in this action.

5 In support of this Motion, the SEC states as follows:

6 1. On January 20, 2023, the Court entered the scheduling order in this action, setting  
7 forth, *inter alia*, a deadline for the exchange of Initial Expert Reports of October 9, 2023, a  
8 deadline for the exchange of Rebuttal Expert Reports of November 8, 2023, and a Discovery  
9 Cut-Off of February 9, 2024. (*See* Dkt. No. 430 (the “Scheduling Order”).

10 2. Since the entry of the Scheduling Order, several defendants have indicated to the  
11 SEC their willingness to discuss potential resolution of this matter which would completely  
12 resolve the action as to those defendants. The SEC, through undersigned counsel, has engaged in  
13 communications with those and other defendants regarding potential resolution, but has advised  
14 defendants that it will be unable to completely resolve or otherwise settle the action, particularly  
15 as to the SEC’s requests for disgorgement and civil penalties, absent the completion of a forensic  
16 accounting.

17 3. The Receiver has retained accounting professionals and has been working  
18 diligently on a comprehensive forensic accounting. As part of this work, the Receiver has  
19 identified over 1,417 unique investor entities and obtained bank records from over 236 separate  
20 financial accounts, and is continuing the process of obtaining addition financial records,  
21 identifying additional investors, and analyzing tens of thousands of transactions in the identified  
22 accounts to make determinations regarding the net amount each defendant and investor obtained  
23 and/or lost as part of the investment scheme described in the SEC’s Amended Complaint. (*See*  
24 Dkt. No. 118.) That work is ongoing, and while undersigned counsel understands that the  
25 Receiver is moving forward as quickly as possible, the Receiver has communicated to  
26 undersigned counsel that because of the significant scope of entities and financial records, this  
27 accounting work will continue until at least January 2024.

1           4. Pursuant to the current discovery schedule, any expert report from the SEC  
2 providing an accounting of monies involved in the investment scheme is due no later than  
3 October 9, 2023. As such, without an extension of the discovery schedule, the SEC will be  
4 required to retain an expert and perform substantially identical accounting work to that of the  
5 Receiver’s accounting professionals, albeit at an accelerated pace. To support that expert work,  
6 the SEC will be required to obtain additional documents and discovery responses from all  
7 defendants and will further be required to take numerous depositions in the upcoming months.  
8 Defendants, meanwhile, will likely be required to retain their own experts to respond to the  
9 SEC’s expert accounting analysis, and will also likely be required to duplicate some of the  
10 accounting work that the Receiver is currently pursuing. These discovery efforts will involve  
11 significant time and expense for all parties.

12           5. It is very likely that a significant portion of this work can be avoided if the parties  
13 can reference and rely on the Receiver’s accounting analysis for purposes of settlement. Under  
14 the current schedule, however, the parties will have no opportunity to review or assess the  
15 Receiver’s analysis until at least two months after expert reports are due, and very possibly not  
16 until fact discovery is completed. As a result, all parties will be required to expend significant  
17 time and resources on discovery that might be avoided—or at least significantly truncated—if  
18 the parties can use the Receiver’s accounting analysis as an aid to resolving this action.

19           6. For this reason, the SEC proposes that the existing discovery and related  
20 deadlines be extended for seven months. This extension will likely streamline this action and  
21 allow the parties the opportunity for out-of-court resolutions without the expense of additional  
22 fact and expert discovery. As the SEC has communicated to the parties, the SEC will continue to  
23 accept discovery requests, and will pursue some additional document discovery from defendants,  
24 but will attempt to avoid unnecessary discovery expense during the period of extension so that  
25 the parties can pursue an expeditious resolution of the case.

26           7. Thus, the SEC respectfully requests that the following scheduling deadlines be  
27 modified so as to permit the parties to continue to discuss potential resolutions of this action:  
28

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Discovery Cut-Off	February 9, 2024	<b>September 9, 2024</b>
Exchange of Initial Expert Reports	October 9, 2023	<b>May 9, 2024</b>
Exchange of Rebuttal Expert Reports	November 8, 2023	<b>June 10, 2024</b>
Last Day to Amend Pleadings or Add Parties	November 13, 2023	<b>June 11, 2024</b>
Dispositive Motion Cut-Off	March 11, 2024	<b>October 9, 2024</b>
Joint Pretrial Order (Ruler 26(a)(3) disclosures shall be included in the Pretrial Order)	April 10, 2024	<b>November 8, 2024</b>

Respectfully submitted,

Dated: June 26, 2023

/s/ Casey R. Fronk  
 Casey R. Fronk  
 Michael E. Welsh  
*Attorneys for Plaintiff*  
*Securities and Exchange Commission*

**CERTIFICATE OF SERVICE**

1 I hereby certify that on the 26th day of June, 2023, I caused Plaintiff's **MOTION TO**  
2 **EXTEND DISCOVERY SCHEDULE (First Request)** to be served to all parties entitled to  
3 service through the Court's ECF system and to the following individuals by the means indicated  
4 below:

5  
6 *By U.S. Mail, first class, postage prepaid, to:*

7  
8 Matthew Wade Beasley and  
9 Beasley Law Group PC and  
10 PAJ Consulting, Inc. (as Registered Agent)  
11 Nevada Southern Detention Center  
12 2190 East Mesquite Avenue  
13 Pahrump, NV 89060

14 Jason M. Jongeward and  
15 JL2 Investments, LLC  
16 [REDACTED]  
17 Washington, UT [REDACTED]

18 Warren Rosegreen and  
19 Triple Threat Basketball, LLC  
20 [REDACTED]  
21 Henderson, NV [REDACTED]

22 Jeffrey Judd  
23 [REDACTED]  
24 Henderson, NV [REDACTED]

25 Jason A. Jenne  
26 [REDACTED]  
27 Las Vegas, NV [REDACTED]

28 Larry Jeffery  
[REDACTED]  
Laguna Beach, CA [REDACTED]

*By email to the following:*

Anthony Michael Alberto, Jr. and Monty Crew, LLC  
[REDACTED]

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Dyke Huish  
Huish Law Firm  
huishlaw@mac.com  
*Counsel for Roland Tanner*

/s/ Casey R. Fronk  
Casey R. Fronk