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14 *J&J Consulting Services, Inc., J&J Consulting*
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15 *The Judd Irrevocable Trust, and BJ Holdings LLC*

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

18 SECURITIES AND EXCHANGE
19 COMMISSION,

Plaintiff,

20 vs.

21 MATTHEW WADE BEASLEY; et al.,

22 Defendants,

23 THE JUDD IRREVOCABLE TRUST, et al.,

24 Relief Defendants.
25

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

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING ON
THE RECEIVER’S MOTION TO
COMPEL OR ALTERNATIVE
MOTION FOR ORDER TO SHOW
CAUSE WHY CHRISTOPHER M.
MADSEN SHOULD NOT BE HELD IN
CONTEMPT FOR FAILURE TO
COMPLY WITH THIS COURT’S
ORDERS**

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1 Court appointed receiver Geoff Winkler (“Receiver”) by and through his counsel of
2 record, the law firm of Greenberg Traurig, LLP; and Christopher M. Madsen (“Madsen”), by and
3 through his counsel of record, the law firm of Pryor Cashman LLP, hereby stipulate as follows:

4 1. On June 2, 2023, the Receiver filed a Motion to Compel or Alternative Motion for
5 Order to Show Cause why Christopher M. Madsen Should Not Be Held in Contempt for Failure
6 to Comply With This Court’s Orders (the “Motion to Compel”). ECF Nos. 525, 526.

7 2. On June 16, 2023, Madsen filed, (a) an Opposition to the Motion to Compel (the
8 “Opposition”), and (b) Cross-Motion for a Stay of All Actions and Proceedings of the Receiver
9 Against Christopher Madsen Pending Final Settlement of This Action (the “Cross-Motion to
10 Stay”). ECF Nos. 530, 531.

11 3. On June 23, 2023, the Receiver filed a Reply in Support of the Motion to Compel
12 and Opposition to the Cross Motion to Stay. ECF Nos. 536, 537.

13 4. Following a June 29, 2023 Status Hearing, this Court entered a Minute Order
14 setting a Status hearing on the Motion to Compel and Cross-Motion to Stay for July 31, 2023 at
15 1:30 p.m. ECF No. 545.

16 5. Following the Receiver’s Motion to Compel, the parties have engaged in further
17 communications and efforts pertaining to the documents, information, and funds the Receiver
18 seeks from Madsen.

19 As such, and in furtherance of the foregoing referenced efforts:

20 A. The parties have agreed to continue the Status hearing on the Motion
21 to Compel and the Cross-Motion to stay for an additional thirty (30) days.

22 B. Through the instant stipulation, the parties respectfully request this
23 Court re-set the status hearing on the Motion to Compel and the Cross-Motion to
24 Stay at the Court’s first availability after August 31, 2023.

25 C. As part of this stipulation, the parties respectfully request this Court
26 refrain from ruling on the Motion to Compel and/or the Cross-Motion to Stay until
27 at least August 31, 2023.

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D. In the event the parties fully resolve the dispute contemplated in the Motion to Compel and the Cross-Motion to Stay, the parties will advise the Court as soon as practically possible.

ACCORDINGLY, IT IS SO STIPULATED AND AGREED

DATED this 26th day of July 2023

DATED this 26th day of July 2023

GREENBERG TRAUERIG, LLP

PRYOR CASHMAN LLP

/s/ Kara B. Hendricks

/s/ John Giardino

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ORDER

IT IS HEREBY ORDERED that:

A. The Status hearing on the Motion to Compel and the Cross-Motion to Stay will be continued for an additional thirty (30) days, to be set on the Court’s first available date after August 31, 2023.

B. The Court will refrain from ruling on the Motion to Compel and the Cross-Motion to Stay until at least August 31, 2023; and

C. In the event the parties fully resolve the dispute contemplated in the Motion to Compel and the Cross-Motion to Stay, the parties will advise the Court as soon as practically possible.

IT IS SO ORDERED.

HONORABLE CRISTINA D. SILVA
Judge, United States District Court

DATE: _____

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CERTIFICATE OF SERVICE

I hereby certify that on **July 26, 2023**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

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

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