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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

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

**STIPULATION AND 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:

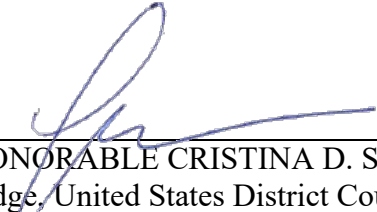
A. The Status hearing on the Motion to Compel and the Cross-Motion to Stay will be continued for an additional thirty (30) days, to be set on the Court’s first available date after August 31, 2023.

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.

D. The July 31, 2023, status hearing is vacated and continued to **September 7, 2023, at 1:30 p.m.** in LV Courtroom 6B.

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
HONORABLE CRISTINA D. SILVA  
Judge, United States District Court

DATE: July 28, 2023

**GREENBERG TRAURIG, LLP**  
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