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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 and 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 and 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 and 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. On July 28, 2023, this Court entered an order granting the parties’ Stipulation and
17 Order to Continue the hearing on the Motion to Compel and the Cross-Motion to Stay, setting the
18 hearing for September 7, 2023. ECF No. 555.

19 6. Thereafter, on August 8, 2023, this Court entered a minute order through which
20 the hearing on the Motion to Compel and the Cross-Motion to Stay was rescheduled to be heard
21 on September 14, 2023. ECF No. 559.

22 7. Following the Receiver’s Motion to Compel, and in the time since the parties’ first
23 stipulation on this matter, (ECF Nos. 553 and 555) the parties have continued their
24 communications and efforts pertaining to the documents, information, and funds the Receiver
25 seeks from Madsen.

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

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

1 B. Through the instant stipulation, the parties respectfully request this
2 Court re-set the status hearing on the Motion to Compel and the Cross-Motion to
3 Stay at the Court’s first availability on or after October 16, 2023.

4 C. As part of this stipulation, the parties respectfully request this Court
5 refrain from ruling on the Motion to Compel and/or the Cross-Motion to Stay until
6 at least October 16, 2023.

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

10 E. This is the second stipulation to continue the hearing on the Motion
11 to Compel and the Cross-Motion to Stay.

12 **ACCORDINGLY, IT IS SO STIPULATED AND AGREED**

13 DATED this 11th day of September 2023

DATED this 11th day of September 2023

14 **GREENBERG TRAUERIG, LLP**

PRYOR CASHMAN LLP

15 */s/ Kara B. Hendricks*

/s/ John Giardino

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Attorney for Christopher M. Madsen

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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 October 16, 2023.

B. The Court will refrain from ruling on the Motion to Compel and the Cross-Motion to Stay until at least October 16, 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 **September 11, 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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