

Greenberg Traurig, LLP  
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135  
(702) 792-3773 (702) 792-9002 (fax)

KARA B. HENDRICKS, Bar No. 07743  
hendricksk@gtlaw.com  
JASON K. HICKS, Bar No. 13149  
hicksja@glaw.com  
KYLE A. EWING, Bar No 014051  
ewingk@gtlaw.com  
**GREENBERG TRAUIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203  
jlr@skrlawyers.com  
KATIE L. CANNATA, Bar No. 14848  
klc@skrlawyers.com  
**SEMENZA KIRCHER RICKARD**  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803  
Facsimile: (702) 920-8669

*Attorneys for Geoff Winkler Receiver for  
J&J Consulting Services, Inc., J&J Consulting Services, Inc.,  
J and J Purchasing LLC, The Judd Irrevocable Trust,  
and BJ Holdings LLC*

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

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY *et al.*

Defendants;

THE JUDD IRREVOCABLE TRUST *et al.*

Relief Defendants.

Case No. 2:22-CV-00612-CDS-EJY

**SECOND NOTICE OF STATUS OF  
COMPLIANCE WITH THIS COURT'S  
AUGUST 25, 2023 HEARING  
DIRECTIVES RELATING TO THE  
RECEIVER'S MOTION FOR  
ORDER TO SHOW CAUSE WHY  
PAULA BEASLEY AND AARON  
GRIGSBY SHOULD NOT BE HELD  
IN CONTEMPT FOR FAILURE TO  
COMPLY WITH THIS COURT'S  
ORDERS AND ALTERNATIVE  
MOTION FOR TURNOVER**

Geoff Winkler, the Court-appointed Receiver (the "Receiver"), by and through his counsel  
of record, the law firm of Greenberg Traurig, LLP, hereby submits the following Second Notice

1 relating to compliance with this Court's directives at the August 25, 2023 hearing, in relation to  
2 the Receiver's Motion for Order to Show Cause Why Paula Beasley and Aaron Grigsby Should  
3 not be Held in Contempt for Failure to Comply With This Court's Orders and Alternative Motion  
4 for Turnover (the "Motion to Show Cause") (ECF Nos. 498, 499).

5 At the August 25, 2023 hearing, the Court provided Mr. Grigsby and Mrs. Beasley until  
6 the close of business on September 29, 2023 to negotiate a resolution to issues raised in the Motion  
7 to Show Cause. Mr. Grigsby failed to meaningfully negotiate and work with the Receiver. As a  
8 result, the Receiver filed a Motion for Contempt (ECF No. 584) and a Motion for Turnover (ECF  
9 No. 585).

10 Mrs. Beasley contacted the Receiver on September 27, 2023, and indicated she was  
11 earnestly looking for new counsel and expressed concerns regarding Mr. Grigsby's prior  
12 representation of her and stated that she believed he misrepresented what occurred in Court filings  
13 and in his communication with the Receiver. As a result of the same, the Receiver agreed to  
14 provide Mrs. Beasley an additional thirty (30) days to find a new attorney and attempt to resolve  
15 the pending issues. A deadline of October 30, 2023 was provided. *See* ECF No. 580.

16 Subsequently, counsel for the Receiver has been contacted by an attorney considering  
17 representing Mrs. Beasley. And on October 26, 2023, Mrs. Beasley contacted the Receiver  
18 requesting additional time. In support of her request, Mrs. Beasley provided the declaration  
19 attached hereto as **Exhibit A**, in which she indicates she is aggressively seeking legal counsel to  
20 represent her in this matter and is attempting to raise money to retain counsel. The declaration  
21 also identifies further concerns regarding Mr. Grigsby's prior representation and indicates  
22 Mrs. Beasley intends to file a bar complaint related to Mr. Grigsby's actions in this matter. *Id.* As  
23 a result of the same, the Receiver believes providing Mrs. Beasley additional time to retain counsel  
24 is prudent.

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1 Based on the foregoing, the Receiver has agreed to provide Mrs. Beasley and additional  
2 three weeks, or until November 20, 2023 to find new counsel and work with the Receiver to reach  
3 a resolution of the issues raised in the Motion to Show Cause. If the Receiver is unable to resolve  
4 the issues by this date, an appropriate motion or motions will be filed.

5 DATED this 30th day of October 2023.

6 **GREENBERG TRAURIG, LLP**

7 By: /s/ Kara B. Hendricks

8 KARA B. HENDRICKS, Bar No. 07743

9 JASON K. HICKS, Bar No. 13149

10 KYLE A. EWING, Bar No. 014051

11 JARROD L. RICKARD, Bar No. 10203

12 KATIE L. CANNATA, Bar No. 14848

13 **SEMENZA KIRCHER RICKARD**

14 DAVID R. ZARO\*

15 JOSHUA A. del CASTILLO\*

16 MATTHEW D. PHAM\*

17 *\*admitted pro hac vice*

18 **ALLEN MATKINS LECK GAMBLE**

19 **MALLORY & NATSIS LLP**

20 *Attorneys for Receiver Geoff Winkler*

**CERTIFICATE OF SERVICE**

I hereby certify that, on the **30th day of October, 2023**, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system, and by serving via email by United States first class mail, postage pre-paid on the parties listed below:

Paula Beasley  
5317 Schoofey Street  
Las Vegas, Nevada 89166  
Telephone: (702) 515-9660

/s/ Evelyn Escobar-Gaddi

An employee of GREENBERG TRAURIG, LLP

**INDEX OF EXHIBITS**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
<b>A</b>	Declaration of Paula Beasley

# EXHIBIT A

# EXHIBIT A

Declaration of Paula Beasley

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

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

MATTHEW WADE BEASLEY, *et al.*,

Defendants,

THE JUDD IRREVOCABLE TRUST, *et al.*,

Relief Defendants.

I, Paula Beasley, hereby declare as follows:

1. I am currently still discussing and attempting to raise money to retain counsel for the above-mentioned case. I am aggressively seeking legal counsel to represent my interests in the above captioned matter and specifically in relation to the Motions to Compel or Alternative Motions for Order to Show Cause why I should not be held in contempt of Court.

2. I was previously represented by attorney Aaron Grigsby.

3. I do not believe Mr. Grigsby had my best interest in mind and believe he misrepresented what occurred in filings with the Court and in his communications with the Receiver. I have full intention on filing a bar complaint in regarding his representation of me and my interests in this case.

4. I have spoken with the Receiver, Geoff Winkler, and requested an additional 3 weeks to provide the information the Court ordered me to produce by October 30, 2023, and to try and negotiate a resolution.

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the foregoing is true and correct.

Executed on October 27, 2023.

  
Paula Beasley (Oct 27, 2023 13:33 PDT)  
Paula Beasley






# Paula Beasley Declaration 10.27.23

Final Audit Report

2023-10-27

Created:	2023-10-27
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## "Paula Beasley Declaration 10.27.23" History

-  Document created by Geoff Winkler (geoff@americanfiduciaryservices.com)  
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