

Greenberg Traurig, LLP
10845 Griffith Peak Drive, Suite 600, Las Vegas, NV 89135
(702) 792-3775 (702) 792-9002 (fax)

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

7 JARROD L. RICKARD, Bar No. 10203
jlr@skrlawyers.com
8 KATIE L. CANNATA, Bar No. 14848
klc@skrlawyers.com
9 **SEMENZA KIRCHER RICKARD**
10 10161 Park Run Drive, Suite 150
11 Las Vegas, Nevada 89145
12 Telephone: (702) 835-6803
Facsimile: (702) 920-8669

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

15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE
19 COMMISSION,
20
21 Plaintiff,
22
23 vs.
24 MATTHEW WADE BEASLEY *et al.*
25 Defendants;
26 THE JUDD IRREVOCABLE TRUST *et al.*
27 Relief Defendants.

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

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

**THIRD 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**

27 Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and through his counsel
28 of record, the law firm of Greenberg Traurig, LLP, hereby submits the following Third 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. (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. As a result of the same, the Receiver provided her until November 20,
19 2023 to retain counsel to work with the Receivers to resolve the issues raised in the Motion to
20 Show Cause. (ECF No. 597).

21 On November 17, 2023, Mrs. Beasley again requested additional time and indicated she
22 was making progress towards retaining new counsel.

23 Based on the foregoing, the Receiver has agreed to provide Mrs. Beasley and additional
24 ten days, or until December 1, 2023 to find new counsel and work with the Receiver to reach a
25 resolution of the issues raised in the Motion to Show Cause.

26 ///

27 ///

28 ///

1 If the Receiver is unable to resolve the issues by this date, an appropriate motion or motions
2 will be filed.

3 DATED this 20th day of November 2023.

4 **GREENBERG TRAUIG, LLP**

5 By: */s/ Kara B. Hendricks*

6 KARA B. HENDRICKS, Bar No. 07743

7 JASON K. HICKS, Bar No. 13149

8 KYLE A. EWING, Bar No. 014051

9 JARROD L. RICKARD, Bar No. 10203

10 KATIE L. CANNATA, Bar No. 14848

11 **SEMENZA KIRCHER RICKARD**

12 DAVID R. ZARO*

13 JOSHUA A. del CASTILLO*

14 MATTHEW D. PHAM*

15 **admitted pro hac vice*

16 **ALLEN MATKINS LECK GAMBLE**

17 **MALLORY & NATSIS LLP**

18 *Attorneys for Receiver Geoff Winkler*

CERTIFICATE OF SERVICE

I hereby certify that, on the **20th day of November, 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

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

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INDEX OF EXHIBITS

EXHIBIT	DESCRIPTION
A	Declaration of Paula Beasley

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28