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

15
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 to move the
4 hearing on the Motion to Compel or Alternative Motion for Order to Show Cause why Christopher
5 M. Madsen Should Not Be Held in Contempt for Failure to Comply With This Court’s Orders
6 (the “Motion to Compel”) (ECF Nos. 525 and 526) to December 13, 2023 at 1:30 p.m., based on
7 the following:

8 1. On June 2, 2023, the Receiver filed the Motion to Compel.

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

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

15 4. Following a June 29, 2023 Status Hearing, this Court entered a Minute Order
16 setting a Status hearing on the Motion to Compel and Cross-Motion to Stay for July 31, 2023 at
17 1:30 p.m. ECF No. 545.

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

21 6. Thereafter, on August 8, 2023, this Court entered a minute order rescheduling the
22 hearing on the Motion to Compel and the Cross-Motion to Stay to September 14, 2023. ECF
23 No. 559.

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1 7. The parties continued their communications and efforts to resolve the issues raised
2 in the Motion to Compel and Cross-Motion to Stay and requested the hearing be continued until
3 October 2023 (ECF No. 570) and provided the Court a status report on October 24, 2023.

4 8. Based on representations by the parties and continued efforts to resolve the issues
5 set forth in the Motion to Compel and Cross-Motion to Stay, a hearing was scheduled for
6 November 27, 2023.

7 9. On November 20, 2023, a minute order was issued moving the hearing on the
8 Motion to Compel and Cross-Motion to Stay from November 27, 2023 to November 28, 2023.
9 (ECF No. 608).

10 10. Counsel for the parties are continuing to work together to try and resolve the
11 matters raised in the Motion to Compel and Cross-Motion to Stay and believe having additional
12 time to try and reach a final resolution would be helpful.

13 11. Additionally, counsel for the Receiver has a conflict at the time scheduled for the
14 hearing on November 28, 2023.

15 12. **Based on the forgoing, the parties respectfully request that the hearing on the**
16 **Motion to Compel and Cross-Motion be moved to December 13, 2023 at 1:30.** This is the
17 same date and time that the Court has scheduled a status hearing and a hearing on several other
18 pending motions in this matter. *See* ECF No. 609.

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

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14. This request is made in good faith, and not for the purpose of delay.

ACCORDINGLY, IT IS SO STIPULATED AND AGREED

DATED this 22nd day of November 2023

DATED this 22nd day of November 2023

GREENBERG TRAUERIG, LLP

PRYOR CASHMAN LLP

/s/ Kara B. Hendricks

/s/ John Giardino

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Attorney for Christopher M. Madsen

ORDER

IT IS HEREBY ORDERED that:

The hearing on the Motion to Compel and the Cross-Motion to Stay will be continued to
December 13, 2023 at 1:30 p.m.

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 **November 22, 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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