

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

1 KARA B. HENDRICKS, Bar No. 07743
hendricksk@gtlaw.com
2 KYLE A. EWING, Bar No 014051
ewingk@gtlaw.com
3 CHRISTIAN T. SPAULDING, ESQ.
Bar No. 014277
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
Las Vegas, Nevada 89145
11 Telephone: (702) 835-6803
12 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,
15 *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

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

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 vs.

22 MATTHEW WADE BEASLEY *et al.*

23 Defendants;

24 THE JUDD IRREVOCABLE TRUST *et al.*

25 Relief Defendants.
26

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

**NOTICE OF NON-OPPOSITION TO
COURT-APPOINTED RECEIVER
GEOFF WINKLER'S MOTION FOR
ORDER AUTHORIZING RECEIVER
TO EMPLOY REAL ESTATE
PROFESSIONAL**

27 ///

28 ///

1 COMES NOW, Geoff Winkler, the Court-appointed Receiver (the “Receiver”), by and
2 through counsel of record the law firm of Greenberg Traurig, LLP, and hereby submits this Notice
3 of Non-Opposition to Motion For Order Authorizing Receiver to Employ Real Estate Professional
4 (the “Motion”) (ECF No. 618).

5 The Motion was filed on December 15, 2023 and any response in opposition thereto, was
6 due by December 29, 2023 pursuant to Local Rule 7-2(b). No response was filed and the deadline
7 to do so has passed. Pursuant to Local Rule 7-2(d) “[t]he failure of an opposing party to file
8 points and authorities in response to any motion, except a motion under Fed. R. Civ. P. 56 or a
9 motion for attorney’s fees, constitutes a consent to the granting of the motion.”

10 In light forgoing and in consideration of the substantive points and legal authorities more
11 fully set forth in the Motion, the Receiver respectfully requests the same be granted. A proposed
12 order granting the Motion is attached to the Motion as Exhibit 2. *See*, ECF No. 618-2.

13 DATED this 8th day of January, 2024.

14 **GREENBERG TRAUIG, LLP**

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

16 KARA B. HENDRICKS

17 Nevada Bar No. 07743

18 KYLE A. EWING

19 Nevada Bar No. 014051

20 CHRISTIAN T. SPAULDING,

21 Nevada Bar No. 014277

22 10845 Griffith Peak Drive, Suite 600

23 Las Vegas, Nevada 89135

24 JARROD L. RICKARD, Bar No. 10203

25 KATIE L. CANNATA, Bar No. 14848

26 **SEMENZA KIRCHER RICKARD**

27 DAVID R. ZARO*

28 JOSHUA A. del CASTILLO*

MATTHEW D. PHAM*

**admitted pro hac vice*

ALLEN MATKINS LECK GAMBLE

MALLORY & NATSIS LLP

Attorneys for Receiver Geoff Winkler

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

CERTIFICATE OF SERVICE

I hereby certify that, on the **8th day of January, 2024**, a true and correct copy of the foregoing was filed electronically via the Court’s 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

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